



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: May 19, 2006
RE: Paoli, Inc / 117-22546-00014
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Paoli, Inc.
201 E. Martin Street
Orleans, Indiana 47452**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T117-6003-00014	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 28, 2002 Expiration Date: March 28, 2007

- 1st Administrative Amendment No.: 117-18430-00014, issued February 10, 2004.
- 2nd Administrative Amendment No.: 117-18980-00014, issued June 10, 2004
- 3rd Administrative Amendment No.: 117-19590-00014, issued August 10, 2004
- 1st Permit Review Request No.: 117-16394-00014, issued December 10, 2004
- 4th Administrative Amendment No.: 117-20071-00014, issued February 18, 2005
- 2nd Permit Review Request No.: 117-20909-00014, issued April 13, 2005

1 st Significant Permit Modification No.: 117-22546-00014	Pages Affected: Whole Permit
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 19, 2006 Expiration Date: March 28, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) . The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary source that manufactures and coats wood office furniture.

Responsible Official:	Michael D. McCracken, Vice President of Operations
Source Address:	201 E. Martin Street, Orleans, IN, 47452
Mailing Address:	P.O. Box 30, Paoli, IN, 47454
General Source Phone Number:	(812) 723-2791
SIC Code:	2521
County Location:	Orange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Desk Line 1:

- (a) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2A.
- (b) One (1) Topcoat #1 Booth, identified as F6A, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6A.
- (c) One (1) Topcoat #2 Booth, identified as F6B, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6B.
- (d) One (1) SAP #1 Booth, identified as F1, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F1.
- (e) One (1) SAP #3 Booth, identified as F12, constructed in 1994, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and emissions controlled by a dry filter, exhausting to stack F12.
- (f) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2.
- (g) One (1) Washcoat Booth, identified as F3, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F3.
- (h) One (1) Wipestain Booth, identified as F4, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F4.

- (i) One (1) Sealer Booth, identified as F5, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F5.
- (j) One (1) Topcoat #3 Booth, identified as F6, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6.
- (k) One (1) Repair Booth, identified as F13, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F13.
- (l) One (1) SAP #2 Booth, identified as F18, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F18.
- (m) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack G1.

Desk Line 2:

- (n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F15.
- (o) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F16.
- (p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.
- (q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F17.
- (r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F19.
- (s) One (1) Topcoat #1 and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F23.
- (t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F22.
- (u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F45.
- (v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F46.
- (w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F47.
- (x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.
- (y) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F28.

Desk Line 3:

- (z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F27.
- (aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F29.

Desk Line 4:

- (bb) One (1) Topcoat and Sealer Booth, identified as F25, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F25.
- (cc) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.

Desk Line 5:

- (dd) One (1) SAP/NGR #1 Booth, identified as F14, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F14.
- (ee) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F11.
- (ff) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F8.

Desk Line 6:

- (gg) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, emissions controlled by a dry filter, exhausting to stack F20.
- (hh) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F21.
- (ii) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack C12.
- (jj) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F26.
- (kk) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F44.

Drawer Line:

- (ll) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F9.

- (mm) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line:

- (nn) One (1) SAP Booth, identified as C1, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C1.
- (oo) One (1) NGR Booth, identified as C2, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C2.
- (pp) One (1) SAP/NGR #1 Booth, identified as C3, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C3.
- (qq) One (1) SAP/NGR #3 Booth, identified as C10, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C10.
- (rr) One (1) Washcoat Booth, identified as C4, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C4.
- (ss) One (1) Wipestain Booth, identified as C5, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C5.
- (tt) One (1) Sealer #1 Booth, identified as C8, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C8.
- (uu) One (1) Topcoat #1 and Sealer #2 Booth, identified as C7, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C7.
- (vv) One (1) Topcoat #2 Booth, identified as C6, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C6.
- (ww) One (1) Repair Booth, identified as C9, constructed in 1995, with a maximum capacity of 9 units per hour, emissions controlled by a dry filter, exhausting to stack C9.
- (xx) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, emissions controlled by a dry filter, exhausting to stack C11.

UV Line:

- (yy) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by water pans, exhausting to stack U1.
- (zz) One (1) Topcoat Booth, identified as U1A/U1B/U1C/U2, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.
- (aaa) One (1) NGR Booth, identified as U3, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U3.
- (bbb) One (1) Sealer Booth, identified as U4, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U4.

- (ccc) One (1) Wipestain Booth, identified as U5, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U5.
- (ddd) One (1) Washcoat Booth, identified as U6, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U6.

Wood Milling and Assembly Operations

- (eee) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.
- (fff) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC4 and DC6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Woodworking facilities, identified as DC7/8 and DC9/10, constructed in 1996, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by two baghouses, exhausting to stack 7. [326 IAC 2-7-1(21)(G)(xxix)][326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: two (2) 2.07 MMBtu/hr boilers, constructed in 1998. [326 IAC 6-2-4]
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Other activities with particulate emissions equal to or less than 5 lb/hr or 25 lb/day: Woodworking operations and sawdust storage.
- (g) Activities with VOC emissions equal to or less than 3 lb/hour or 15 lb/day: Two (2) dip tanks with a total maximum capacity of 42.125 units per hour; one (1) test booth, identified as R&D1, constructed in 1998, with a maximum capacity of 12 oz. stain per 8 hour day.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T117-22456-00014, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This

certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1st of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMPs does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The

Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or

possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to the applicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
- (1) Condition 8(a) from CP 117-5122-00014, issued on August 26, 1996, limiting the facilities U1, U1A/U1B/U1C/U2, U3, U4, U5, U6, U7, U8, and U9 to less than 3.24 tons of VOC per month has been modified to reflect the fact that booths U7, U8, and U9 were never constructed. Therefore, this limit applies to booths U1, U1A/U1B/U1C/U2, U3, U4, U5, and U6.
 - (2) Condition 8(b) from CP 117-5122-00014, issued on August 26, 1996, listing requirements pursuant to 326 IAC 2-2, is not applicable because IDEM, OAQ has determined that the Tellus Plant lines 1 and 2, consisting of sixteen (16) spray booths (T1-T16), were never constructed.
 - (3) Condition 8(c) from CP 117-5122-00014, issued on August 26, 1996, listing requirements pursuant to 326 IAC 2-2, is not applicable because IDEM, OAQ has determined that the Tellus Line, Off Gun Line, Deskline 2 additions, Conference Table Line additions, Drawer Assembly Line additions, and Chair Line additions were never constructed.
 - (4) Condition 7 from CP 117-4210-00014, issued on March 28, 1995, listing requirements pursuant to 326 IAC 6-2-4 is not applicable because IDEM, OAQ has determined that the wood-fired boiler B1, was never constructed.
 - (5) Conditions 12, 13, and 14 from CP 117-9309-00014, issued on March 20, 1998, limiting PM emissions from the Finish Sander, listing compliance requirements for the baghouse controlling emissions from the Finish Sander, and listing monitoring requirements from the Finish Sander's exhaust are not applicable because IDEM, OAQ has determined that the Finish Sander is no longer in operation as it has been removed from the source.
 - (6) Conditions 4, 9, 10, and 11 from CP 117-4210-00014, issued on March 28, 1995, requiring testing of, limiting emissions from, and requiring monitoring of baghouse DC2 are not applicable because IDEM, OAQ has determined that the baghouse DC2, was never constructed.
 - (7) Condition 4 from CP 117-4210-00014, issued on March 28, 1995, requiring testing of baghouses DC4 and DC6 is not applicable because IDEM, OAQ has determined that the controlled PM emissions from baghouses DC4 and DC6 are less than the allowable emissions required pursuant to 326 IAC 6-3-2. The baghouse specifications stated in the original construction permit application indicated that the maximum particulate matter (PM) emissions from the woodworking baghouses would exceed the allowable PM emissions pursuant to 326 IAC 6-3-2 (Process Operations). Based on the design outlet grain loadings and air flow rates stated in the original application, the potential PM emissions after control were originally estimated at 32.02 pounds per hour. Pursuant to 326 IAC 6-3, the allowable PM emission rate is 9.145 pounds per hour for a process weight rate of 6,622.65 pounds per hour. Therefore, the outlet grain loadings for baghouses DC4 and DC6 were limited to 0.008 gr/dscf. These limits reduced the PM potential to emit to 9.10 pounds per hour to achieve compliance with the

allowable PM emission rate. Stack testing was required to demonstrate that the reduced outlet grain loadings were not being exceeded at the maximum production rate.

The Office of Air Quality (OAQ) received and reviewed an application from Paoli, Inc. for a permit revision to PSD permit, CP 117-4210-00014, as previously amended by A 117-8544-00014. The application requested removal of the stack testing requirement for two baghouse dust collectors on the woodworking operations, identified as DC4 and DC6.

Removal of the stack test requirements have been approved by the OAQ Compliance Branch, provided that there is a condition that there are no visible emissions from the building openings. This requirement was already included in the original permit. Visible emission notations, quarterly inspection, and bag failure requirements have been added consistent with current compliance monitoring requirements for Title V woodworking sources.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T087-14534-00051 and issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized official" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirement of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OA, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) (The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Identification of Emission Units and Stacks [326 IAC 2-7-6]

The Permittee shall maintain an up-to-date plant layout print that clearly identifies the location each spray booth and stack exhaust at the source. The plant layout print, which will be kept at the source, will facilitate compliance determination, inspections, monitoring, and record keeping for each spray booth and exhaust stack.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [326 IAC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:
Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.17 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a

description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32). ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

(a) Records of all required data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any project (as defined in 326 IAC 2-3-1) (II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
- (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
- (4) Any other information that the Permittee deems fit to include in this report:

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Desk Line 1:

- (a) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2A.
- (b) One (1) Topcoat #1 Booth, identified as F6A, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6A.
- (c) One (1) Topcoat #2 Booth, identified as F6B, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6B.
- (d) One (1) SAP #1 Booth, identified as F1, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F1.
- (e) One (1) SAP #3 Booth, identified as F12, constructed in 1994, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and emissions controlled by a dry filter, exhausting to stack F12.
- (f) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2.
- (g) One (1) Washcoat Booth, identified as F3, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F3.
- (h) One (1) Wipestain Booth, identified as F4, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F4.
- (i) One (1) Sealer Booth, identified as F5, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F5.
- (j) One (1) Topcoat #3 Booth, identified as F6, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6.
- (k) One (1) Repair Booth, identified as F13, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F13.
- (l) One (1) SAP #2 Booth, identified as F18, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F18.
- (m) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack G1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.1

FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]:

Desk Line 2:

- (n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F15.
- (o) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F16.
- (p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.
- (q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F17.
- (r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F19.
- (s) One (1) Topcoat #1 and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F23.
- (t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F22.
- (u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F45.
- (v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F46.
- (w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F47.
- (x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.
- (y) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F28.

Desk Line 3:

- (z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F27.
- (aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F29.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]:

Desk Line 4:

- (bb) One (1) Topcoat and Sealer Booth, identified as F25, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F25.
- (cc) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.

Desk Line 5:

- (dd) One (1) SAP/NGR #1 Booth, identified as F14, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F14.
- (ee) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F11.
- (ff) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F8.

Desk Line 6:

- (gg) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, emissions controlled by a dry filter, exhausting to stack F20.
- (hh) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F21.
- (ii) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack C12.
- (jj) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F26.
- (kk) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F44.

Drawer Line:

- (ll) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F9.
- (mm) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]:

Chair Line:

- (nn) One (1) SAP Booth, identified as C1, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C1.
- (oo) One (1) NGR Booth, identified as C2, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C2.
- (pp) One (1) SAP/NGR #1 Booth, identified as C3, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C3.
- (qq) One (1) SAP/NGR #3 Booth, identified as C10, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C10.
- (rr) One (1) Washcoat Booth, identified as C4, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C4.
- (ss) One (1) Wipestain Booth, identified as C5, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C5.
- (tt) One (1) Sealer #1 Booth, identified as C8, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C8.
- (uu) One (1) Topcoat #1 and Sealer #2 Booth, identified as C7, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C7.
- (vv) One (1) Topcoat #2 Booth, identified as C6, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C6.
- (ww) One (1) Repair Booth, identified as C9, constructed in 1995, with a maximum capacity of 9 units per hour, emissions controlled by a dry filter, exhausting to stack C9.
- (xx) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, emissions controlled by a dry filter, exhausting to stack C11.

UV Line:

- (yy) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by water pans, exhausting to stack U1.
- (zz) One (1) Topcoat Booth, identified as U1A/U1B/U1C/U2, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.
- (aaa) One (1) NGR Booth, identified as U3, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]:

UV Line: (continued)

- (bbb) One (1) Sealer Booth, identified as U4, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U4.
- (ccc) One (1) Wipestain Booth, identified as U5, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U5.
- (ddd) One (1) Washcoat Booth, identified as U6, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 VOC BACT [326 IAC 2-2-3(a)]

Pursuant to CP 117-4210-00014, issued March 28, 1995, and 326 IAC 2-2-3(a), facilities F17 through F26, F44 through F47, G1, and C1 through C12, shall use:

- (a) Less than thirty-seven (37) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This limit is equivalent to less than four hundred and forty-five (445) tons VOC, calculated on a twelve month average rolled on a monthly basis. This usage limit is based upon actual hours of operation and has been determined to serve as the BACT for this source;
- (b) Dry filters for overspray control; and
- (c) HVLP spray application methods when applying SAP stain, NGR, and washcoats; and air-assisted airless or airless application methods when applying sealers, topcoats, fillers, and wipestains.

In addition, the following pollution prevention techniques shall be applied:

- (d) The cleanup solvents shall be stored in closed containers with soft gasketed spring-loaded closures,
- (e) The cleanup rags saturated with solvent be stored, transported, and disposed of in containers that are closed tightly, and
- (f) The spray guns used are the type that can be cleaned without the need for spraying the solvent into the air.

D.1.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.

D.1.3 Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

- (a) The wood furniture coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions from contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.
 - (B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.
- (1) Operator training courses.
 - (2) Leak inspection and maintenance plan.
 - (3) Cleaning and washoff solvent accounting system.
 - (4) Chemical composition of cleaning and washoff solvents.
 - (5) Spray booth cleaning.
 - (6) Storage requirements.
 - (7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
 - (8) Line cleaning.

- (9) Gun cleaning.
 - (10) Washoff operations.
 - (11) Formulation assessment plan for finishing operations.
- (c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the particulate matter emissions from the surface coating units shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and comply with the following requirements:

- (a) The source shall operate the control device in accordance with manufacturer's specifications
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Particulate Matter (PM) Control

Pursuant to 117-2932-00014, issued January 12, 1994, 117-2759-00014, issued August 6, 1994, 117-4210-00014, issued March 28, 1995, and in order to comply with Condition D.1.5, the dry filters for PM control shall be in proper placement and control emissions from the booths at all times when the respective booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Operator Training Program

The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The volume weighted VOC content of the coatings used for each month;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain copies of the training program, the list of trained operators, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

- (c) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.3.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (d) To document compliance with Condition D.1.3(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
- (2) July 1 through December 31.
- (c) The report required by (b) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Wood Milling and Assembly Operations:

- (eee) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.
- (fff) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Best Available Control Technology (BACT) Condition

Pursuant to CP 117-4210-00014, issued on March 28, 1995, the baghouses have been determined to be BACT for the Wood Milling and Furniture Assembly processes. The allowable outlet grain loadings from baghouses DC4 and DC6 are 0.008 grains per dry standard cubic foot (gr/dscf) each, with the input gas flow rates not to exceed 61,000 dry standard cubic feet per minute (dscfm) each. The PM emissions from the Wood Milling and Furniture Assembly operations shall be in compliance provided that the visible emissions from stacks 4 and 6 are limited to ten (10) percent opacity and there no are visible emissions from the building openings.

The equivalent allowable particulate matter (PM) emissions for the wood milling and assembly processes are 18.3 tons per year, each. Compliance with this limit will satisfy the requirements of 326 IAC 6-3-2.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP 117-4210-00014, issued on March 28, 1995, and pursuant to 326 IAC 6-3-2, the PM from the Wood Milling and Furniture Assembly processes shall not exceed 9.14 pounds per hour each when operating at a process weight rate of 6,622.65 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their baghouses.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

Pursuant to CP 117-4210-00014, issued on March 28, 1995, and in order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM control shall be in operation and control emissions from the Wood Milling and Furniture Assembly operations at all times that the facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Wood Milling and Furniture Assembly stack exhaust (stacks 4 and 6) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed at the Wood Milling and Furniture Assembly stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.2.6 Parametric Monitoring

Pursuant to CP 117-4210-00014, issued on March 28, 1995, the Permittee shall record the pressure drop across the baghouses used in conjunction with the Wood Milling and Furniture Assembly operations, at least once weekly when the wood milling and furniture assembly are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the wood milling and furniture assembly stack exhaust when venting to the atmosphere.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
 - (1) Weekly records of the pressure during normal operation when venting to the atmosphere; and
 - (2) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

Woodworking Operations:

- (a) Woodworking facilities, identified as DC7/8 and DC9/10, constructed in 1996, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by two baghouses, exhausting to stack 7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily, when exhausting to the atmosphere, using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
- (1) The baghouse shall be inspected.
- (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

Compliance with these limitations will satisfy the requirements of Condition D.3.2 (326 IAC 2-2) and D.3.3 (326 IAC 6-3-2).

D.3.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 117-5122-00014, issued on August 26, 1996, the particulate emissions from the woodworking facilities exhausting to stack 7 shall not exceed 5.7 pounds PM per hour and 3.4 pounds PM-10 per hour. This limit is required to limit the potential to emit of PM to less than 25 tons and PM-10 to less than 15 tons, per 12 consecutive month period. Compliance with this limit will satisfy the requirements of 326 IAC 6-3-2.

Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 the PM emissions from the woodworking facilities exhausting to stack 7 shall not exceed 7.37 pounds PM per hour when operating at a process weight rate of 4,800 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control equipment.

Compliance Determination Requirements

D.3.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)(DD)]

Pursuant to CP 117-5122-00014, issued on August 26, 1996, and in order to comply with conditions D.3.1, D.3.2 and D.3.3, the baghouse/cyclone combination for PM control shall be in operation and control emissions from the woodworking facilities exhausting to stack 7 at all times that the facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.3.1(c) are not required, and will be replaced by the following:

- (a) Daily visible emission notations of the Woodworking Process stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed at the woodworking operations, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.3.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies

as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1(c) and D.3.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust when exhausting to the atmosphere.
- (b) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: two (2) 2.07 MMBtu/hr boilers, constructed in 1998. [326 IAC 6-2-4]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), insignificant sources of particulate matter shall not exceed the allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

D.4.2 Particulate Matter (PM) Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the PM emissions from each of the two (2) 2.07 MMBtu/hr natural gas-fired boilers shall not exceed 0.6 pounds per million BTU heat input.

SECTION E.1 PLANTWIDE APPLICABILITY LIMITATION REQUIREMENTS

Facility Description [326 IAC 2-7-5(15)]

The entire plant site is subject to the Plantwide Applicability Limitation [PAL] requirements described in this E section.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Source Wide Emission Limits [326 IAC 2-2.4-7(1)]

E.1.1 Emission limits [326 IAC 2-2.4-7(1)]

Volatile Organic Compounds (VOC) emissions from the entire source shall not exceed 419.5 tons per 12 consecutive month period with compliance determined at the end of each month. This provision does not supersede any other VOC emission limits contained in this permit.

General PAL Requirements [326 IAC 2-2.4-1]

E.1.2 Major New Source Review Applicability [326 IAC 2-2.4-1(c)]

Any physical change in or change in the method of operation of this source is not a major modification for VOC, and not subject to the review requirements of 326 IAC 2-2 provided the actual emissions of VOC from the entire source do not exceed the emission limits in Condition E.1.1 of this permit.

E.1.3 General PAL requirements [326 IAC 2-2.4-7, 326 IAC 2-2.4-8, 326 IAC 2-2.4-9, 326 IAC 2-2.4-10, 326 IAC 2-2.4-11, 326 IAC 2-2.4-15]

- (a) The requirements of this E Section become effective on the issuance date of SPM 117-22546-00014, and expire ten years after that issuance date.
- (b) If the Permittee applies to renew this PAL at least six months prior to expiration of the PAL, but no earlier than eighteen months prior to the expiration of the PAL, then notwithstanding the expiration date in subsection E.1.3(a), the PAL shall continue to be effective until the revised permit with the renewed PAL is issued. The application must contain the elements described in 326 IAC 2-2.4-3 and 326 IAC 2-2.4-10.
- (c) Once this PAL expires, if not otherwise renewed, then the requirements of 326 IAC 2-2.4-9 are applicable.
- (d) The requirements for renewing this PAL are described in 326 IAC 2-2.4-10.
- (e) The requirements for increasing the emissions limits described in Condition E.1.1 are described in 326 IAC 2-2.4-11.
- (f) The requirements applicable to terminating or revoking this PAL are described in 326 IAC 2-2.4-15.

Monitoring Requirements [326 IAC 2-2.4-7(6) & (7)] [326 IAC 2-2.4-12]

E.1.4 Volatile Organic Compound (VOC) Emission Limit Determination [326 IAC 2-2.4-7(6) and (7)] [326 IAC 2-2.4-12]

The Permittee shall determine actual annual emissions of VOC by employing the following techniques:

- (a) The Permittee shall calculate VOC emissions (in tons) from all surface coating activities and related operations, each calendar month using mass balance calculations. The monthly VOC emissions are the sum of the VOC emissions from each coating or solvent used during the month. The VOC emissions from each coating or solvent will be

calculated by multiplying the VOC content of a coating or solvent by the amount of that coating or solvent used during the calendar month.

- (b) The mass balance calculations described in (a) above shall meet the following requirements:
- (1) The Permittee shall provide a demonstrated means of validating the published content of the VOC that is contained in or created by all materials used in or at the emissions units.
 - (2) Assume that each emission unit emits all of the VOC that is contained in or created by that unit if it cannot otherwise be accounted for in the process.
 - (3) Where the vendor of a material, which is used in or at an emissions unit, publishes a range of pollutant content from the material, the Permittee must use the highest value of the range to calculate VOC emissions unless the IDEM determines there is site-specific data or a site-specific monitoring program to support another content within the range.
- (c) The VOC emissions from the insignificant boilers and heaters shall be calculated using the appropriate AP-42 emission factors and the total heat input capacity or fuel usage of the units.

Record Keeping and Reporting [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

E.1.5 Record keeping requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-13]

- (a) The Permittee shall retain a copy of all records necessary to determine compliance with the requirements of this E Section and Condition D.1.1(a), including a determination of each emissions unit's twelve (12) month rolling total emissions, for five years from the date of the record. Those records include, but are not limited to:
- (1) The amount and VOC content of each coating material and solvent used at the source. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The volume weighted VOC content of the coatings used for each month;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) The Permittee shall retain a copy of the PAL permit application, any applications for revisions to the PAL, each annual compliance certification as required by Condition B.9 of this permit, and data relied on in the certification for the duration of the PAL plus five years.

E.1.6 Reporting requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-14]

- (a) The Permittee shall submit a semi-annual report, containing the information described below, to the address listed in Section C – General Reporting Requirements, within thirty (30) days after the end of the calendar quarter being reported. This report requires the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). The report shall include the following information:
- (1) The identification of the owner and operator of the source and the permit number.

- (2) Total emissions of VOC, in tons per rolling 12 month period for each month in the reporting period, as determined by Condition E.1.4.
 - (3) All data relied upon, including but not limited to, any quality assurance or quality control data, in determining emissions.
 - (4) A list of any emissions units modified or added to the major stationary source during the reporting period.
 - (5) If not previously reported pursuant to another condition in this permit, the number, duration, and cause of any deviations or monitoring malfunctions, and any corrective action taken.
- (b) The procedures for reporting deviations from the requirements of this Section E, and the procedures for reporting emissions in excess of the limit in Condition E.1.1 are described in Condition B.15. A report that describes emissions exceeding the PAL limit shall include the quantity of emissions emitted by the source. This term satisfies the requirements of 326 IAC 2-2.4-14(c).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN 47452
Mailing Address: P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: T117-6003-00014

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN 47452
Mailing Address: P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: T117-6003-00014

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <p>§ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</p> <p>§ The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</p>

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

PART 70 OPERATING PERMIT Semi-Annual Report

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Paoli, Inc.
 Source Address: 201 E. Martin Street, Orleans, IN, 47452
 Mailing Address: P.O. Box 30, Paoli, IN, 47454
 Part 70 Permit No.: T117-6003-00014
 Facilities: All surface coating booths
 Parameter: VOC and VHAPs - NESHAP
 Limit: (1) Finishing operations - 1.0 lb VHAP/lb Solids
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
 (3) All other thinners - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners (% by weight)	Thinner/Solvent mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT Semi-Annual Report

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN 47452
Mailing Address: P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: T117-6003-00014
Facility: Entire Source
Parameter: Total plantwide VOC emissions
Limit: 419 tons per 12 consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Plantwide VOC Emissions	Plantwide VOC Emissions	Plantwide VOC Emissions
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
Month 4			
Month 5			
Month 6			

Along with this report, the Permittee shall submit the information required by Condition E.1.6 in a manner consistent with that condition and Section C of the Part 70 permit.

- 9 No deviation occurred in this quarter.

- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 QUARTERLY REPORT

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN 47452
Mailing Address: P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: T117-6003-00014
Facility: Spray booths F17 through F26, F44 through F47, G1, and C1 through C12, inclusive
Parameter: Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit: Less than 37 tons per month (less than 445 tons calculated on a twelve month average rolled on a monthly basis)

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN 47452
Mailing Address: P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: T117-6003-00014

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD)
for a Plantwide Applicability Limitation (PAL) Permit
and a
Part 70 Significant Permit Modification**

Source Description and Location

Source Name:	Paoli, Inc.
Source Location:	201 East Martin St., Orleans IN 47454
County:	Orange
SIC Code:	2521
Operation Permit No.:	T117-6003-00014
Operation Permit Issuance Date:	March 28, 2002
Significant Permit Modification No.:	117-22546-00014
Permit Reviewer:	ERG/BS

Existing Approvals

The source was issued Part 70 Operating Permit No. T117-6003-00014 on March 28, 2002. The source has since received the following approvals:

- (a) AA 117-18430-00014, issued February 10, 2004;
- (b) AA 117-18980-00014, issued June 10, 2004;
- (c) AA 117-19590-00014, issued August 10, 2004;
- (e) Applicability Determination 117-16394-00014, issued December 10, 2004;
- (f) AA 117-20071-00014, issued February 18, 2005; and
- (g) Review Request 117-20909-00014, issued April 13, 2005

County Attainment Status

The source is located in Orange County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Orange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x

emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Orange County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (c) Orange County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO₂, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD applicability.

Source Status

The table below summarizes the potential to emit of the entire source after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	Less than 100
PM ₁₀	Less than 100
SO ₂	Less than 100
VOC	Greater than 250
CO	Less than 100
NO _x	Less than 100

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the emissions information contained in the TSD for T117-6003-00014 on March 28, 2002.

The table below summarizes the potential to emit HAPs for the entire source after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Single HAPs	Greater than 10
Total HAPs	Greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because the HAP PTE is greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table presents the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM ₁₀	Not reported
SO ₂	Not reported
VOC	266
CO	Not reported
NO _x	Not reported
HAP	Not reported

Background and Description of Permit Modification

The Office of Air Quality (OAQ) received a Significant Permit Modification application from Paoli, Inc. on December 22, 2005 for a Plantwide Applicability Limitation (PAL) for VOC relating to the operation of a stationary source that manufactures and coats wood office furniture. Paoli was issued a Part 70 permit (T117-6003-00014) on March 28, 2002. That permit included several VOC limitations from past approvals. Those limitations cover various coating booths across various coating lines. In order to streamline compliance determination and provide maximum operational flexibility, Paoli requested a PAL for VOC. This VOC PAL will replace the existing VOC limitations required with respect to 326 IAC 2-2.

Once issued, the PAL permit provisions will enable Paoli to install new equipment, expand existing operations, add new operations, and modify its processes without the changes being subject to Major New Source Review (NSR) requirements in 326 IAC 2-2 as long as Paoli maintains compliance with the PAL provisions.

The PAL VOC limit applies to the entire plant site, which includes the following types of operations:

- (a) All surface coating operations; including, but not limited to: Desk Line 1, Desk Line 2, Desk Line 3, Desk Line 4, Desk Line 5, Desk Line 6, Drawer Line, Chair Line and the UV Line.
- (b) All activities associated with surface coating or cleaning; including surface preparation, cleaning, mixing, and storage. This includes significant and insignificant activities.
- (c) Fossil fuel-fired boilers and heaters.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

Baseline Actual Emissions

Baseline actual emissions are defined in 326 IAC 2-2-1(xx) as the average actual emissions from any 24 month period of the last 10 years. Paoli selected a baseline period of the 24 month period beginning January 1, 1996 and ending December 31, 1997.

Pollutant	Emissions in year 1996 (tons/yr)	Emissions in year 1997 (tons/yr)	Baseline actual emissions (tons/yr)
VOC	309.59	300.89	305

See Appendix A for the description of how the Baseline Actual Emissions and PAL limit were developed.

PAL Emissions Limit

The OAQ has determined that the VOC Plantwide Applicability Limitation (PAL) for this source is **419 tons per year**.

Federal Rule Applicability Determination

40 CFR 51.166(w) and 326 IAC 2-2.4 (Plantwide Applicability Limitations)

These rules provide for the use of plantwide applicability limitations (PAL). Paoli has requested a PAL for VOC.

Pursuant to 326 IAC 2-2.4-1(a), a source that is subject to P.L. 231-2003, Section 6 shall comply with the requirements of 326 IAC 2-2.6. Paoli does not belong to one of the SIC codes listed in the 326 IAC 2-2.6 (Federal Requirements for Sources Subject to PL 231-2003, Endangered Industries), therefore, Paoli is not subject to 326 IAC 2-2.6.

Pursuant to 326 IAC 2-2.4-1(b), the OAQ may approve the use of a PAL for any existing major stationary source if the PAL meets the requirements in this rule (326 IAC 2-2.4).

Pursuant to 326 IAC 2-2.4-1(c), if Paoli maintains its total source-wide VOC emissions below the PAL level, meets the requirements in this rule, and complies with the PAL permit, then any physical change in or change in the method of operation of the source:

- (1) is not a major modification for the PAL permit;
- (2) does not have to be approved through 326 IAC 2-2; and
- (3) is not subject to 2-2-8(a)(3).

Pursuant to 326 IAC 2-2.4-1(d), except as provided under subsection (b)(3), Paoli shall continue to comply with all applicable federal or state requirements, emissions limitations, and work practice requirements that were established prior to the effective date of the PAL.

40 CFR Part 64 (Compliance Assurance Monitoring (CAM))

In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit has potential emissions (before controls), of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source, 2) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, and 3) the unit uses a control device to achieve compliance with the applicable emission limitation or standard.

Pursuant to 40 CFR 64.5(a)(3), the Permittee is required to submit the information required under 40 CFR 64.4 regarding the facilities at this source as part of the Part 70 renewal application because the Part 70 application was submitted prior to April 20, 1998.

State Rule Applicability Determination and Requirements

The following state rules are applicable to the source for this PAL permit:

326 IAC 2-2.4-7 (Contents of the PAL permit)

(a) The PAL permit must contain, at a minimum, the following information:

- (1) The PAL pollutant and the applicable source-wide emission limitation in tons per year.
- (2) The PAL permit effective date and the expiration date of the PAL.
- (3) Specification in the PAL permit that if the Permittee applies to renew a PAL before the end of the PAL effective period, then the PAL shall not expire at the end of the PAL effective period. It shall remain in effect until a revised PAL permit is issued by the department.
- (4) A requirement that emission calculations for compliance purposes include emissions from startups, shutdowns, and malfunctions.
- (5) A requirement that, once the PAL expires, the major stationary source is subject to the requirements of 326 IAC 2-2.4-9.
- (6) The calculation procedures that the Permittee shall use to convert the monitoring system data to monthly emissions and annual emissions based on a twelve (12) month rolling total.
- (7) A requirement that the Permittee monitor all emissions units in accordance with 326 IAC 2-2.4-12.
- (8) A requirement to retain the records required under 326 IAC 2-2.4-13 on site. The records may be retained in an electronic format.
- (9) A requirement to submit the reports required under 326 IAC 2-2.4-14 by the required deadlines.
- (10) Any other requirements that IDEM deems necessary to implement and enforce the PAL.

326 IAC 2-2.4-8 (PAL effective period and reopening of the PAL permit)

The PAL effective period is ten (10) years.

326 IAC 2-2.4-9 (Expiration of a PAL)

- (a) If this PAL is not renewed in accordance with the procedures in 326 IAC 2-2.4-10 it shall expire at the end of the PAL effective period, and the requirements in this section shall apply.
- (b) Each emissions unit or each group of emissions units that existed under the PAL shall comply with an allowable emission limitation under a revised permit established.
- (c) Until IDEM issues the revised permit incorporating allowable limits for each emissions unit, or each group of emissions units, the Permittee shall continue to comply with a source-wide, multiunit emissions cap equivalent to the level of the PAL emission limitation.

- (d) Any physical change or change in the method of operation at the source will be subject to major NSR requirements if the change meets the definition of major modification in 326 IAC 2-2-1(ee).
- (e) The Permittee shall continue to comply with any state or federal applicable requirements that may have applied either during the PAL effective period or prior to the PAL effective period except for those emission limitations that had been established under 326 IAC 2-2-8(a)(3), but were eliminated by the PAL.

326 IAC 2-2.4-10 (Renewal of a PAL)

The Permittee shall submit a timely application to IDEM to request renewal of a PAL. A timely application is one that is submitted at least six (6) months prior to, but not earlier than eighteen (18) months from the date of PAL expiration. If the Permittee submits a complete application to renew the PAL within this time period, then the PAL shall continue to be effective until the revised permit with the renewed PAL is issued.

326 IAC 2-2.4-12 (Monitoring requirements for PAL)

- (a) The following general requirements apply:
 - (1) Each PAL permit must contain enforceable requirements for the monitoring system that accurately determine plantwide emissions of the PAL pollutants in terms of mass per unit of time. Any monitoring system authorized for use in the PAL permit must be based on sound science and meet generally acceptable scientific procedures for data quality and manipulation. Additionally, the information generated by the system must meet minimum legal requirements for admissibility in a judicial proceeding to enforce the PAL permit.
 - (2) The PAL monitoring system must employ one (1) or more of the four (4) general monitoring approaches meeting the minimum requirements set forth in subsection (b) and must be approved by the department.
 - (3) Notwithstanding subdivision (2), an alternative monitoring approach may be employed:
 - (A) that meets subdivision (1); and
 - (B) if it is approved by the IDEM.
 - (4) Failure to use a monitoring system that meets the requirements of this section renders the PAL invalid.
- (b) The followings are acceptable general monitoring approaches when conducted in accordance with the minimum requirements in subsections (c) through (i):
 - (1) Mass balance calculations for activities using solvents.
 - (2) CEMS.
 - (3) CPMS or PEMS.
 - (4) Emission factors.
- (c) The Permittee when using mass balance calculations to monitor PAL pollutant emissions from activities using solvents shall meet the following requirements:
 - (1) Provide a demonstrated means of validating the published content of the PAL pollutant that is contained in or created by all materials used in or at the emissions unit.

- (2) Assume that the emissions unit emits all of the PAL pollutant that is contained in or created by any raw material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process.
 - (3) Where the vendor of a material or fuel, which is used in or at the emissions unit, publishes a range of pollutant content from the material, the Permittee must use the highest value of the range to calculate the PAL pollutant emissions unless the IDEM determines there is site-specific data or a site-specific monitoring program to support another content within the range.
- (d) The Permittee when using emission factors to monitor PAL pollutant emissions shall meet the following requirements:
- (1) All emission factors shall be adjusted, if appropriate, to account for the degree of uncertainty or limitations in the factors development.
 - (2) The emissions unit shall operate within the designated range of use for the emission factor if applicable.
 - (3) If technically practicable, the Permittee that relies on an emission factor to calculate PAL pollutant emissions shall conduct validation testing to determine a site-specific emission factor within six (6) months of PAL permit issuance unless the IDEM determines that testing is not required.
- (e) The Permittee must record and report maximum potential emissions without considering enforceable emission limitations or operational restrictions for an emissions unit during any period of time that there is no monitoring data unless another method for determining emissions during the periods is specified in the PAL permit.
- (f) All data used to establish the PAL pollutant must be revalidated through performance testing or other scientifically valid means approved by the IDEM. The testing must occur at least once every five (5) years after issuance of the PAL.

326 IAC 2-2.4-13 (Record keeping requirements)

- (a) The Permittee shall retain a copy of all records necessary to determine compliance with any requirement of this rule and of the PAL, including a determination of each emissions unit's twelve (12) month rolling total emissions, for five (5) years from the date of the record.
- (b) The Permittee shall retain a copy of the following records for the duration of the PAL effective period plus five (5) years:
 - (1) A copy of the PAL permit application and any applications for revisions to the PAL.
 - (2) Each annual certification of compliance pursuant to 40 CFR Part 70 and the data relied on in certifying the compliance.

326 IAC 2-2.4-14 (Reporting and notification requirements)

The Permittee shall submit semiannual monitoring reports and deviation reports to the IDEM in accordance with 326 IAC 2-7.

326 IAC 6-3-2 (Particulate Emission Limitations)

The source was issued its Part 70 permit on March 28, 2002 – that permit contained requirements pursuant to 326 IAC 6-3-2 for the surface coating booths at the source. 326 IAC 6-2-3 was revised on June 12, 2002 and those revisions were incorporated into the Indiana SIP on September 13, 2005. As a result, this permit modification also reflects the revisions to 326 IAC 6-

3-2 as they apply to the surface coating booths covered by the PAL. See the Proposed Changes section of this document.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination and monitoring requirements applicable to this PAL permit are included in Condition E.1.4 of the attached permit and are shown in the Proposed Changes section below. Those monitoring conditions are necessary to ensure compliance with the PAL.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 117-6003-00014 to: 1) incorporate the PAL and the applicable PAL requirements, 2) revise general Part 70 permit language, and 3) update the Part 70 permit to reflect the rearrangement of several surface coating booths. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**.

Changes to Section B, Section C, and Section D

The mailing address for IDEM, OAQ has been changed throughout the permit. Section B – General Conditions and Section C - Source Operation Conditions have been revised, deleted or added to the permit to clarify the permit and condition terms. Rules cites have been updated. When conditions are added or deleted, the other conditions are renumbered accordingly and the Table of Contents modified to reflect these changes.

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of the Section B – Preventive Maintenance condition and has amended the Section B – Emergency Provisions condition. IDEM has clarified the Section B Operational Flexibility condition.

The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, (a) has been removed from the Section B Duty to Provide Information condition. Section B Compliance with Permit Conditions has been deleted from the permit and now appears on the title page of the permit. A statement was added to Section B Certification in order to clarify that the certification form may cover more than one document that is submitted. The name of IDEM's billing section has been updated in Section B Annual Fee Payment.

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental

Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence. Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule became effective March 16, 2005 and is incorporated into this permit under Section B Credible Evidence.

IDEM realizes that the specifications of Section C Pressure Gauge and Other Instrument Specifications can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have also been revised to reflect the new condition title.

Operation of equipment was listed two places in the permit. IDEM has decided that it is best to have this requirement under compliance determination in the specific D conditions; therefore, it has been deleted from the C Section. Section C Asbestos Abatement Projects has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable. Section C Risk Management Plan has been revised so that it is more straightforward, and the condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

Section C Emission Statement has been updated to include the specific rule cite that defines the regulated pollutants being referred to in this condition. The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, Section C General Record Keeping Requirements has been updated. Section C General Reporting Requirements has been updated to clarify the meaning of reporting periods and "calendar year".

Note that Sections D.1 through D.5 of the existing Part 70 permit have been consolidated into a new Section D.1. All of the respective surface coating operations at this source have the same or similar requirements. Therefore, IDEM has decided to restructure the permit in this manner for clarity and to eliminate duplicative requirements.

Several VOC limits were established for the purpose of limiting VOC emissions to less than PSD significance thresholds. Pursuant to 326 IAC 2-2.4-1(c)(3), such limits can be eliminated when a source is granted a PAL permit. Therefore, previous conditions D.1.1, D.2.1, D.4.1 and D.5.1 (and the associated record keeping and reporting requirements) have been removed from the permit.

A new section of the permit (Section E) has been added to the permit to include the PAL requirements.

SECTION B ~~GENERAL CONDITIONS~~

B.1 ~~Definitions [326 IAC 2-7-1]~~

~~Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.~~

~~B.2 — Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]~~

~~This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.~~

~~B.3 — Enforceability [326 IAC 2-7-7]~~

~~Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.~~

~~B.4 — Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]~~

~~The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).~~

~~B.5 — Severability [326 IAC 2-7-5(5)]~~

~~The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.~~

~~B.6 — Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]~~

~~This permit does not convey any property rights of any sort or any exclusive privilege.~~

~~B.7 — Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]~~

~~(a) — The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~The submittal by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

~~(b) — The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~

~~(c) — The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~

~~B.8 — Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]~~

~~(a) — The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

- ~~(1) — Enforcement action;~~
- ~~(2) — Permit termination, revocation and reissuance, or modification; or~~
- ~~(3) — Denial of a permit renewal application.~~
- ~~(b) — Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~
- ~~(c) — It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~
- ~~(d) — An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

~~B.9 — Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]~~

- ~~(a) — Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~
- ~~(b) — One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.~~
- ~~(c) — A responsible official is defined at 326 IAC 2-7-1(34).~~

~~B.10 — Annual Compliance Certification [326 IAC 2-7-6(5)]~~

- ~~(a) — The Permittee shall annually submit a compliance certification report which addresses the status of the source=s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1st of each year to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

~~United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch —Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

- ~~(b) — The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

- ~~(c) The annual compliance certification report shall include the following:~~
- ~~(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;~~
 - ~~(2) The compliance status;~~
 - ~~(3) Whether compliance was continuous or intermittent;~~
 - ~~(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and~~
 - ~~(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.~~

~~The submittal by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

~~B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 4-6-3]~~

- ~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:~~
- ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
 - ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~
 - ~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~

~~If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~The PMP and the PMP extension notification do not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

- ~~(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.~~
- ~~(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~
- ~~(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The~~

~~records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

~~B.12 Emergency Provisions [326 IAC 2-7-16]~~

~~(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.~~

~~(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:~~

~~(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;~~

~~(2) The permitted facility was at the time being properly operated;~~

~~(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;~~

~~(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;~~

~~Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967~~

~~(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~within two (2) working days of the time when emission limitations were exceeded due to the emergency.~~

~~The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:~~

~~(A) A description of the emergency;~~

~~(B) Any steps taken to mitigate the emissions; and~~

~~(C) Corrective actions taken.~~

~~The notification which shall be submitted by the Permittee does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

~~(6) The Permittee immediately took all reasonable steps to correct the emergency.~~

- ~~(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.~~
- ~~(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.~~
- ~~(e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.~~
- ~~(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.~~
- ~~(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]~~

- ~~(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.~~
- ~~(b) In addition to the applicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
 - ~~(1) Condition 8(a) from CP 117-5122-00014, issued on August 26, 1996, limiting the facilities U1, U1A/U1B/U1C/U2, U3, U4, U5, U6, U7, U8, and U9 to less than 3.24 tons of VOC per month has been modified to reflect the fact that booths U7, U8, and U9 were never constructed. Therefore, this limit applies to booths U1, U1A/U1B/U1C/U2, U3, U4, U5, and U6.~~
 - ~~(2) Condition 8(b) from CP 117-5122-00014, issued on August 26, 1996, listing requirements pursuant to 326 IAC 2-2, is not applicable because IDEM, OAQ has determined that the Tellus Plant lines 1 and 2, consisting of sixteen (16) spray booths (T1-T16), were never constructed.~~
 - ~~(3) Condition 8(c) from CP 117-5122-00014, issued on August 26, 1996, listing requirements pursuant to 326 IAC 2-2, is not applicable because IDEM, OAQ has determined that the Tellus Line, Off Gun Line, Desklane 2 additions, Conference Table Line additions, Drawer Assembly Line additions, and Chair Line additions were never constructed.~~~~

- ~~(4) Condition 7 from CP 117-4210-00014, issued on March 28, 1995, listing requirements pursuant to 326 IAC 6-2-4 is not applicable because IDEM, OAQ has determined that the wood-fired boiler B1, was never constructed.~~
- ~~(5) Conditions 12, 13, and 14 from CP 117-9309-00014, issued on March 20, 1998, limiting PM emissions from the Finish Sander, listing compliance requirements for the baghouse controlling emissions from the Finish Sander, and listing monitoring requirements from the Finish Sander's exhaust are not applicable because IDEM, OAQ has determined that the Finish Sander is no longer in operation as it has been removed from the source.~~
- ~~(6) Conditions 4, 9, 10, and 11 from CP 117-4210-00014, issued on March 28, 1995, requiring testing of, limiting emissions from, and requiring monitoring of baghouse DC2 are not applicable because IDEM, OAQ has determined that the baghouse DC2, was never constructed.~~
- ~~(7) Condition 4 from CP 117-4210-00014, issued on March 28, 1995, requiring testing of baghouses DC4 and DC6 is not applicable because IDEM, OAQ has determined that the controlled PM emissions from baghouses DC4 and DC6 are less than the allowable emissions required pursuant to 326 IAC 6-3-2. The baghouse specifications stated in the original construction permit application indicated that the maximum particulate matter (PM) emissions from the woodworking baghouses would exceed the allowable PM emissions pursuant to 326 IAC 6-3-2 (Process Operations). Based on the design outlet grain loadings and air flow rates stated in the original application, the potential PM emissions after control were originally estimated at 32.02 pounds per hour. Pursuant to 326 IAC 6-3, the allowable PM emission rate is 9.145 pounds per hour for a process weight rate of 6,622.65 pounds per hour. Therefore, the outlet grain loadings for baghouses DC4 and DC6 were limited to 0.008 gr/dscf. These limits reduced the PM potential to emit to 9.10 pounds per hour to achieve compliance with the allowable PM emission rate. Stack testing was required to demonstrate that the reduced outlet grain loadings were not being exceeded at the maximum production rate.~~

~~The Office of Air Quality (OAQ) received and reviewed an application from Paoli, Inc. for a permit revision to PSD permit, CP 117-4210-00014, as previously amended by A 117-8544-00014. The application requested removal of the stack testing requirement for two baghouse dust collectors on the woodworking operations, identified as DC4 and DC6.~~

~~Removal of the stack test requirements have been approved by the OAQ Compliance Branch, provided that there is a condition that there are no visible emissions from the building openings. This requirement was already included in the original permit. Visible emission notations, quarterly inspection, and bag failure requirements have been added consistent with current compliance monitoring requirements for Title V woodworking sources.~~

- ~~(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to~~

~~be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.~~

- ~~(e) — Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:~~
- ~~(1) — The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;~~
 - ~~(2) — The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;~~
 - ~~(3) — The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and~~
 - ~~(4) — The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.~~
- ~~(f) — This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).~~
- ~~(g) — This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]~~
- ~~(i) — This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]~~

~~B.14 — Prior Permits Superseded [326 IAC 2-1.1-9.5]~~

- ~~(a) — All terms and conditions of previous permits issued pursuant to permitting program approved into the state implementation plan have been either:~~
- ~~(1) — Incorporated as originally stated,~~
 - ~~(2) — revised, or~~
 - ~~(3) — deleted~~
- ~~by this permit.~~
- ~~(b) — All previous registrations and permits are superseded by this permit.~~

~~B.15 — Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]~~

- ~~(a) — Deviations from any permit requirements (for emergencies see Section B – Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the ~~authorized official~~ as defined by 326 IAC 2-7-1.1-1(1).

~~(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~

~~(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

~~B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]~~

~~(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the ~~responsible official~~ as defined by 326 IAC 2-7-1(34).~~

~~(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:~~

~~(1) That this permit contains a material mistake.~~

~~(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.~~

~~(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]~~

~~(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]~~

~~(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(e)]~~

~~B.17 Permit Renewal [326 IAC 2-7-4]~~

~~(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the ~~responsible official~~ as defined by 326 IAC 2-7-1(34).~~

~~Request for renewal shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~

~~(1) A timely renewal application is one that is:~~

- (A) ~~Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~
- (B) ~~If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- (2) ~~If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.~~
- (c) ~~Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.~~
- (d) ~~United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.~~

~~B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]~~

- (a) ~~Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.~~
- (b) ~~Any application requesting an amendment or modification of this permit shall be submitted to:~~
- ~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~
- ~~Any such application shall be certified by the responsible official as defined by 326 IAC 2-7-1(34).~~
- (c) ~~The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

~~B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]~~

- (a) ~~No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.~~
- (b) ~~Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are~~

explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

~~B.20 — Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]~~

~~(a) — The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:~~

- ~~(1) — The changes are not modifications under any provision of Title I of the Clean Air Act;~~
- ~~(2) — Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;~~
- ~~(3) — The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);~~
- ~~(4) — The Permittee notifies the:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

~~United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch — Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

~~in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and~~

- ~~(5) — The Permittee maintains records on site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.~~

~~Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).~~

~~(b) — The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

- ~~(1) — A brief description of the change within the source;~~
- ~~(2) — The date on which the change will occur;~~
- ~~(3) — Any change in emissions; and~~
- ~~(4) — Any permit term or condition that is no longer applicable as a result of the change.~~

~~The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

~~(c) Emission Trades [326 IAC 2-7-20(c)]~~

~~The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).~~

~~(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]~~

~~The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.~~

~~B.21 Source Modification Requirement [326 IAC 2-7-10.5]~~

~~A modification, construction, or reconstruction is governed by the requirement of 326 IAC 2 and 326 IAC 2-7-10.5.~~

~~B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]~~

~~Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OA, U.S. EPA, or an authorized representative to perform the following:~~

~~(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;~~

~~(b) Have access to and copy any records that must be kept under the conditions of this permit;~~

~~(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;~~

~~(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~

~~(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.~~

~~B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]~~

~~(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.~~

~~(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

~~B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]~~

~~(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.~~

~~(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.~~

~~(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.~~

~~SECTION C SOURCE OPERATION CONDITIONS~~

Entire Source

~~Emission Limitations and Standards [326 IAC 2-7-5(1)]~~

~~C.1 Identification of Emission Units and Stacks [326 IAC 2-7-6]~~

~~The Permittee shall maintain an up-to-date plant layout print that clearly identifies the location each spray booth and stack exhaust at the source. The plant layout print, which will be kept at the source, will facilitate compliance determination, inspections, monitoring, and record keeping for each spray booth and exhaust stack.~~

~~C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(e)]~~

~~Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~C.3 Opacity [326 IAC 5-1]~~

~~Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:~~

~~(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.~~

~~(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.~~

~~C.4 Open Burning [326 IAC 4-1] [326 IAC 13-17-9]~~

~~The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

~~C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]~~

~~The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.~~

~~C.6 Fugitive Dust Emissions [326 IAC 6-4]~~

~~The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.~~

~~C.7 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

~~C.8 Stack Height [326 IAC 1-7]~~

~~The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.~~

~~C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos-containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos-containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(C) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(e) Procedures for Asbestos Emission Control~~

~~The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

~~(f) Indiana Accredited Asbestos Inspector~~

~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.~~

Testing Requirements [326 IAC 2-7-6(1)]

~~C.10 Performance Testing [326 IAC 3-6]~~

- ~~(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

~~A test protocol, except as provided elsewhere in this permit, shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.~~

Compliance Requirements [326 IAC 2-1.1-11]

~~C.11 Compliance Requirements [326 IAC 2-1.1-11]~~

~~The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.~~

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

~~C.12 — Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

~~Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.~~

~~The notification which shall be submitted by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

~~Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.~~

~~C.13 — Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~

~~(a) — In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.~~

~~(b) — The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

~~C.14 — Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

~~Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.~~

~~C.15 — Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

~~(a) — Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~

~~(b) — Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~

~~(c) — The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can~~

~~demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.~~

~~Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]~~

~~C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

~~Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):~~

- ~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~
- ~~(b) These ERPs shall be submitted for approval to:
Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~
- ~~(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~
- ~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~
- ~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- ~~(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

~~C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]~~

~~If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:~~

- ~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~
- ~~(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);~~

~~All documents submitted pursuant to this condition shall include the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

~~C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]~~

- ~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~

- ~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
- ~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~
- ~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - ~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~
 - ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
 - ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.~~
 - ~~(4) Failure to take reasonable response steps shall constitute a violation of the permit.~~~~
- ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:
 - ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
 - ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~
 - ~~(3) An automatic measurement was taken when the process was not operating.~~
 - ~~(4) The process has already returned or is returning to operating within normal parameters and no response steps are required.~~~~
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

- (f) ~~Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

~~C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]~~

- (a) ~~When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~
- (b) ~~A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.~~
- (c) ~~IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.~~

~~The documents submitted pursuant to this condition do require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

~~Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

~~C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]~~

- (a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1st of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~
- (1) ~~Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
- (2) ~~Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.~~
- (b) ~~The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~The emission statement does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).~~

- (c) ~~The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

~~C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]~~

- ~~(a) — Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- ~~(b) — Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.~~

~~G.22 — General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]~~

- ~~(a) — The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the ~~responsible official~~ as defined by 326 IAC 2-7-1(34).~~
- ~~(b) — The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~
- ~~(c) — Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- ~~(d) — Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the ~~responsible official~~ as defined by 326 IAC 2-7-1(34).~~
- ~~(e) — The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.~~

Stratospheric Ozone Protection

~~G.23 — Compliance with 40 CFR 82 and 326 IAC 22-1~~

~~Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:~~

- ~~(a) — Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~
- ~~(b) — Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~
- ~~(c) — Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T117-22546-00014, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1st of each year to:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

and

**United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590**

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible

official” as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMPs do not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or

other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;**

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:**

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;**
- (B) Any steps taken to mitigate the emissions; and**
- (C) Corrective actions taken.**

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.**
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.**
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.**
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.**
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.**

- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to the applicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
- (1) Condition 8(a) from CP 117-5122-00014, issued on August 26, 1996, limiting the facilities U1, U1A/U1B/U1C/U2, U3, U4, U5, U6, U7, U8, and U9 to less than 3.24 tons of VOC per month has been modified to reflect the fact that booths U7, U8, and U9 were never constructed. Therefore, this limit applies to booths U1, U1A/U1B/U1C/U2, U3, U4, U5, and U6.
 - (2) Condition 8(b) from CP 117-5122-00014, issued on August 26, 1996, listing requirements pursuant to 326 IAC 2-2, is not applicable because IDEM, OAQ has determined that the Tellus Plant lines 1 and 2, consisting of sixteen (16) spray booths (T1-T16), were never constructed.
 - (3) Condition 8(c) from CP 117-5122-00014, issued on August 26, 1996, listing requirements pursuant to 326 IAC 2-2, is not applicable because IDEM, OAQ has determined that the Tellus Line, Off Gun Line, Descline 2 additions, Conference Table Line additions, Drawer Assembly Line additions, and Chair Line additions were never constructed.
 - (4) Condition 7 from CP 117-4210-00014, issued on March 28, 1995, listing requirements pursuant to 326 IAC 6-2-4 is not applicable because IDEM, OAQ has determined that the wood-fired boiler B1, was never constructed.
 - (5) Conditions 12, 13, and 14 from CP 117-9309-00014, issued on March 20, 1998, limiting PM emissions from the Finish Sander, listing compliance requirements for the baghouse controlling emissions from the Finish Sander, and listing monitoring requirements from the Finish Sander's exhaust are not applicable because IDEM, OAQ has determined that the Finish Sander is no longer in operation as it has been removed from the source.

- (6) Conditions 4, 9, 10, and 11 from CP 117-4210-00014, issued on March 28, 1995, requiring testing of, limiting emissions from, and requiring monitoring of baghouse DC2 are not applicable because IDEM, OAQ has determined that the baghouse DC2, was never constructed.
- (7) Condition 4 from CP 117-4210-00014, issued on March 28, 1995, requiring testing of baghouses DC4 and DC6 is not applicable because IDEM, OAQ has determined that the controlled PM emissions from baghouses DC4 and DC6 are less than the allowable emissions required pursuant to 326 IAC 6-3-2. The baghouse specifications stated in the original construction permit application indicated that the maximum particulate matter (PM) emissions from the woodworking baghouses would exceed the allowable PM emissions pursuant to 326 IAC 6-3-2 (Process Operations). Based on the design outlet grain loadings and air flow rates stated in the original application, the potential PM emissions after control were originally estimated at 32.02 pounds per hour. Pursuant to 326 IAC 6-3, the allowable PM emission rate is 9.145 pounds per hour for a process weight rate of 6,622.65 pounds per hour. Therefore, the outlet grain loadings for baghouses DC4 and DC6 were limited to 0.008 gr/dscf. These limits reduced the PM potential to emit to 9.10 pounds per hour to achieve compliance with the allowable PM emission rate. Stack testing was required to demonstrate that the reduced outlet grain loadings were not being exceeded at the maximum production rate.

The Office of Air Quality (OAQ) received and reviewed an application from Paoli, Inc. for a permit revision to PSD permit, CP 117-4210-00014, as previously amended by A 117-8544-00014. The application requested removal of the stack testing requirement for two baghouse dust collectors on the woodworking operations, identified as DC4 and DC6.

Removal of the stack test requirements have been approved by the OAQ Compliance Branch, provided that there is a condition that there are no visible emissions from the building openings. This requirement was already included in the original permit. Visible emission notations, quarterly inspection, and bag failure requirements have been added consistent with current compliance monitoring requirements for Title V woodworking sources.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T087-14534-00051 and issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized official” as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

**Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

- (b) A timely renewal application is one that is:

- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit

revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirement of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OA, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the

certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) (The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Identification of Emission Units and Stacks [326 IAC 2-7-6]

The Permittee shall maintain an up-to-date plant layout print that clearly identifies the location each spray booth and stack exhaust at the source. The plant layout print, which will be kept at the source, will facilitate compliance determination, inspections, monitoring, and record keeping for each spray booth and exhaust stack.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60,

Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [326 IAC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management

**Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

**Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five

(45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale.**
- (b) **The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.**

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) **The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.**
- (b) **These ERPs shall be submitted for approval to:
Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) **If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.**
- (d) **These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.**
- (e) **Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.**
- (f) **Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]**

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.17 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) **Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) **The response shall include minimizing the period of any startup, shutdown or**

malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;**
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
- (1) monitoring results;**
 - (2) review of operation and maintenance procedures and records;**
 - (3) inspection of the control device, associated capture system, and the process.**
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) The Permittee shall maintain the following records:**
- (1) monitoring data;**
 - (2) monitor performance data, if applicable; and**
 - (3) corrective actions taken.**

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32). (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (a) Records of all required data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any project (as defined in 326 IAC 2-3-1) (II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as

defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and

- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**
 - (1) The name, address, and telephone number of the major stationary source.**
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.**
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).**
 - (4) Any other information that the Permittee deems fit to include in this report:**

Reports required in this part shall be submitted to:

**Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204**
- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.**

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.**
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.**
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.**

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Desk Line 1:

- (a) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2A.
- (b) One (1) Topcoat #1 Booth, identified as F6A, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6A.
- (c) One (1) Topcoat #2 Booth, identified as F6B, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6B.
- (d) **One (1) SAP #1 Booth, identified as F1, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F1.**
- (e) **One (1) SAP #3 Booth, identified as F12, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F12.**
- (f) **One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2.**
- (g) **One (1) Washcoat Booth, identified as F3, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F3.**
- (h) **One (1) Wipestain Booth, identified as F4, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F4.**
- (i) **One (1) Sealer Booth, identified as F5, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F5.**
- (j) **One (1) Topcoat #3 Booth, identified as F6, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6.**
- (k) One (1) Repair Booth, identified as F13, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F13.
- (l) **One (1) SAP #2 Booth, identified as F18, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F18.**
- (m) **One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack G1.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.1

FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]:

Desk Line 2:

- (n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F15.
- (o) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F16.
- (p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.
- (q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F17.
- (r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F19.
- (s) One (1) Topcoat #1 and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F23.
- (t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F22.
- (u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F45.
- (v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F46.
- (w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F47.
- (x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.
- (y) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F28.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.1

FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]:

Desk Line 3:

- (z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F27.**
- (aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F29.**

Desk Line 4:

- (bb) One (1) Topcoat and Sealer Booth, identified as F25, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F25.**
- (cc) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.**

Desk Line 5:

- (dd) One (1) SAP/NGR #1 Booth, identified as F14, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F14.**
- (ee) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F11.**
- (ff) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F8.**

Desk Line 6:

- (gg) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, emissions controlled by a dry filter, exhausting to stack F20.**
- (hh) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F21.**
- (ii) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack C12.**
- (jj) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F26.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.1

FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]:

Desk Line 6: (continued)

(kk) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F44.

Drawer Line:

(ll) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F9.

(mm) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line:

(nn) One (1) SAP Booth, identified as C1, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C1.

(oo) One (1) NGR Booth, identified as C2, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C2.

(pp) One (1) SAP/NGR #1 Booth, identified as C3, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C3.

(qq) One (1) SAP/NGR #3 Booth, identified as C10, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C10.

(rr) One (1) Washcoat Booth, identified as C4, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C4.

(ss) One (1) Wipestain Booth, identified as C5, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C5.

(tt) One (1) Sealer #1 Booth, identified as C8, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C8.

(uu) One (1) Topcoat #1 and Sealer #2 Booth, identified as C7, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]:

Chair Line: (continued)

- (vv) One (1) Topcoat #2 Booth, identified as C6, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C6.
- (ww) One (1) Repair Booth, identified as C9, constructed in 1995, with a maximum capacity of 9 units per hour, emissions controlled by a dry filter, exhausting to stack C9.
- (xx) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, emissions controlled by a dry filter, exhausting to stack C11.

UV Line:

- (yy) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by water pans, exhausting to stack U1.
- (zz) One (1) Topcoat Booth, identified as U1A/U1B/U1C/U2, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.
- (aaa) One (1) NGR Booth, identified as U3, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U3.
- (bbb) One (1) Sealer Booth, identified as U4, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U4.
- (ccc) One (1) Wipestain Booth, identified as U5, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U5.
- (ddd) One (1) Washcoat Booth, identified as U6, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21] VOC BACT [326 IAC 2-2-3(a)]

Pursuant to 117-2932-00014, issued January 12, 1994, facilities F2A, F6A, F6B, and F13 shall use less than 20 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC from these booths to less than 240 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Pursuant to CP 117-4210-00014, issued March 28, 1995, and 326 IAC 2-2-3(a), facilities F17 through F26, F44 through F47, G1, and C1 through C12, shall use:

- (a) Less than thirty-seven (37) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This limit is equivalent to less than four hundred and forty-five (445) tons VOC, calculated on a twelve month average rolled on a monthly

basis. This usage limit is based upon actual hours of operation and has been determined to serve as the BACT for this source;

- (b) Dry filters for overspray control; and**
- (c) HVLP spray application methods when applying SAP stain, NGR, and washcoats; and air-assisted airless or airless application methods when applying sealers, topcoats, fillers, and wipestains.**

In addition, the following pollution prevention techniques shall be applied:

- (d) The cleanup solvents shall be stored in closed containers with soft gasketed spring-loaded closures,**
- (e) The cleanup rags saturated with solvent be stored, transported, and disposed of in containers that are closed tightly, and**
- (f) The spray guns used are the type that can be cleaned without the need for spraying the solvent into the air.**

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to ~~417-2932-00014, issued January 12, 1994,~~ and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

~~Pursuant to 326 IAC 6-3-2, the PM from the surface coating operations shall be limited by the following equation:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~$$E = 4.10 P^{0.67}$$
 where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour~~

Pursuant to 326 IAC 6-3-2(d), the particulate matter emissions from the surface coating units shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and comply with the following requirements:

- (a) The source shall operate the control device in accordance with manufacturer's specifications**

- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

...

Compliance Determination Requirements

~~D.1.7 VOC Emissions~~

~~Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the previous twelve month consecutive period.~~

D.1.87 Volatile Organic Compounds (VOC)

...

D.1.98 Particulate Matter (PM) Control

Pursuant to 117-2932-00014, issued January 12, 1994, **117-2759-00014, issued August 6, 1994, 117-4210-00014, issued March 28, 1995**, and in order to comply with **Condition D.1.5**, the dry filters for PM control shall be in proper placement and control emissions from the paint booths at all times when the paint **respective** booths are in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.1.410 Record Keeping Requirements~~

...

- (b) To document compliance with Condition ~~D.1.409~~, the Permittee shall maintain copies of the training program, the list of trained operators, additional inspections prescribed by the Preventive Maintenance Plan, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

...

~~D.1.4211 Reporting Requirements~~

...

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

Deskline 1:

- (d) One (1) SAP #1 Booth, identified as F1, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F1.
- (e) One (1) SAP #3 Booth, identified as F12, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F12.
- (f) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2.
- (g) One (1) Washcoat Booth, identified as F3, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F3.
- (h) One (1) Wipestain Booth, identified as F4, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F4.
- (i) One (1) Sealer Booth, identified as F5, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F5.
- (j) One (1) Topcoat #3 Booth, identified as F6, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6.

Deskline 2:

- (l) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F15.
- (m) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F16.

Deskline 1 & 2:

- (n) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.

Deskline 5:

- (o) One (1) SAP/NGR #1 Booth, identified as F14, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F14.
- (p) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F11.
- (q) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F8.

SECTION D.2 FACILITY OPERATION CONDITIONS (Continued)

Drawerline:

- (r) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F9.
- (s) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 117-2759-00014, issued August 6, 1994, facilities F1 through F12, and F14 through F16 shall use less than 20 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC from these booths to less than 240 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.

D.2.3 Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions from contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.

- ~~(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.~~
- ~~(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.~~
- ~~(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.~~
- ~~(b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.~~
 - ~~(1) Operator training courses.~~
 - ~~(2) Leak inspection and maintenance plan.~~
 - ~~(3) Cleaning and washoff solvent accounting system.~~
 - ~~(4) Chemical composition of cleaning and washoff solvents.~~
 - ~~(5) Spray booth cleaning.~~
 - ~~(6) Storage requirements.~~
 - ~~(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).~~
 - ~~(8) Line cleaning.~~
 - ~~(9) Gun cleaning.~~
 - ~~(10) Washoff operations.~~
 - ~~(11) Formulation assessment plan for finishing operations.~~
- ~~(c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.~~

~~D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]~~

~~Pursuant to 117-2759-00014, issued August 6, 1994, and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:~~

- ~~Airless Spray Application~~
- ~~Air Assisted Airless Spray Application~~
- ~~Electrostatic Spray Application~~
- ~~Electrostatic Bell or Disc Application~~
- ~~Heated Airless Spray Application~~
- ~~Roller Coating~~

~~Brush or Wipe Application
Dip and Drain Application~~

~~High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.~~

~~D.2.5 Particulate Matter (PM) [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2, the PM from the surface coating operations shall be limited by the following equation:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$~~E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}~~$$

~~D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.~~

Compliance Determination Requirements

~~D.2.7 VOC Emissions~~

~~Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the previous twelve month consecutive period.~~

~~D.2.8 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~D.2.9 Particulate Matter (PM)~~

~~Pursuant to 117-2759-00014, issued August 6, 1994 and in order to comply with D.2.5, the dry filters for PM control shall be in proper placement and control emissions from the paint booths at all times when the paint booths are in operation.~~

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.2.10 Operator Training Program~~

~~The permittee shall implement an operator training program.~~

~~(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.~~

~~(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful~~

~~completion. Copies of the training program, the list of trained operators and training records shall be maintained on-site or available within 1 hour for inspection by IDEM.~~

~~(e) All operators shall be given refresher training annually.~~

~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Record Keeping and Reporting Requirements ~~[326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

D.2.11 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.~~
- ~~(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - ~~(2) The volume weighted VOC content of the coatings used for each month;~~
 - ~~(3) The cleanup solvent usage for each month;~~
 - ~~(4) The total VOC usage for each month; and~~
 - ~~(5) The weight of VOCs emitted for each compliance period.~~
- ~~(b) To document compliance with Condition D.2.10, the Permittee shall maintain copies of the training program, the list of trained operators, additional inspections prescribed by the Preventive Maintenance Plan, and training records shall be maintained on-site or available within 1 hour for inspection by IDEM.~~
- ~~(c) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.2.3.~~
- ~~(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.~~
 - ~~(2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.~~
 - ~~(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.~~
 - ~~(4) The VHAP content in weight percent of each thinner used.~~
 - ~~(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.~~
- ~~(d) To document compliance with Condition D.2.3(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.~~

- ~~(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

~~D.2.12 Reporting Requirements~~

- ~~(a) A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.2.3 and the Certification form, shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the six (6) months being reported.~~

~~The six (6) month periods shall cover the following months:~~

- ~~(1) January 1 through June 30.~~
- ~~(2) July 1 through December 31.~~

- ~~(c) The report required by (b) of this condition shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

~~United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Deskline 1:

- (t) One (1) SAP #2 Booth, identified as F18, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F18.
- (u) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack G1.

Deskline 2:

- (v) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F17.
- (w) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F19.
- (x) One (1) Topcoat #1 and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F23.
- (y) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F22.

Deskline 3:

- (z) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F45.
- (aa) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F46.
- (bb) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F47.

Deskline 4:

- (cc) One (1) Topcoat and Sealer Booth, identified as F25, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F25.
- (dd) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.

Deskline 6:

- (ee) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, emissions controlled by a dry filter, exhausting to stack F20.
- (ff) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F21.
- (gg) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack C12.

SECTION D.3 FACILITY OPERATION CONDITIONS (Continued)

~~(hh) — One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F26.~~

~~(ii) — One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F44.~~

Chairline:

~~(jj) — One (1) SAP Booth, identified as C1, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C1.~~

~~(kk) — One (1) NGR Booth, identified as C2, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C2.~~

~~(ll) — One (1) SAP/NGR #1 Booth, identified as C3, constructed in 1995, with a maximum capacity of 40 units per hour, emissions controlled by a dry filter, exhausting to stack C3.~~

~~(mm) — One (1) SAP/NGR #3 Booth, identified as C10, constructed in 1995, with a maximum capacity of 40 units per hour, emissions controlled by a dry filter, exhausting to stack C10.~~

~~(nn) — One (1) Washcoat Booth, identified as C4, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C4.~~

~~(oo) — One (1) Wipestain Booth, identified as C5, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C5.~~

~~(pp) — One (1) Sealer #1 Booth, identified as C8, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C8.~~

~~(qq) — One (1) Topcoat #1 and Sealer #2 Booth, identified as C7, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C7.~~

~~(rr) — One (1) Topcoat #2 Booth, identified as C6, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C6.~~

~~(ss) — One (1) Repair Booth, identified as C9, constructed in 1995, with a maximum capacity of 9 units per hour, emissions controlled by a dry filter, exhausting to stack C9.~~

~~(tt) — One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, emissions controlled by a dry filter, exhausting to stack C11.~~

~~(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)~~

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Best Available Control Technology (BACT) Condition (326 IAC 2-2-3(a))

Pursuant to CP 117-4210-00014, issued March 28, 1995, and 326 IAC 2-2-3(a), facilities F17 through F26, F44 through F47, G1, and C1 through C12, shall use:

- (a) — Less than thirty-seven (37) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This limit is equivalent to less than four hundred and forty-five (445) tons VOC, calculated on a twelve month average rolled on a monthly basis.

~~This usage limit is based upon actual hours of operation and has been determined to serve as the BACT for this source;~~

- ~~(b) Dry filters for overspray control; and~~
- ~~(c) HVLP spray application methods when applying SAP stain, NGR, and washcoats; and air-assisted airless or airless application methods when applying sealers, topcoats, fillers, and wipestains.~~

~~In addition, the following pollution prevention techniques shall be applied:~~

- ~~(d) The cleanup solvents shall be stored in closed containers with soft gasketed spring-loaded closures;~~
- ~~(e) The cleanup rags saturated with solvent be stored, transported, and disposed of in containers that are closed tightly, and~~
- ~~(f) The spray guns used are the type that can be cleaned without the need for spraying the solvent into the air.~~

~~D.3.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]~~

~~The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.~~

~~D.3.3 Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]~~

~~(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:~~

- ~~(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - ~~(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or~~
 - ~~(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or~~
 - ~~(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or~~
 - ~~(D) Use a combination of (A), (B), and (C).~~~~
- ~~(2) Limit VHAP emissions from contact adhesives as follows:
 - ~~(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.~~~~

- ~~(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.~~
- ~~(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.~~
- ~~(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.~~
- ~~(b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.~~
 - ~~(1) Operator training courses.~~
 - ~~(2) Leak inspection and maintenance plan.~~
 - ~~(3) Cleaning and washoff solvent accounting system.~~
 - ~~(4) Chemical composition of cleaning and washoff solvents.~~
 - ~~(5) Spray booth cleaning.~~
 - ~~(6) Storage requirements.~~
 - ~~(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).~~
 - ~~(8) Line cleaning.~~
 - ~~(9) Gun cleaning.~~
 - ~~(10) Washoff operations.~~
 - ~~(11) Formulation assessment plan for finishing operations.~~
- ~~(c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.~~

~~D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]~~

~~Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:~~

- ~~Airless Spray Application~~
- ~~Air Assisted Airless Spray Application~~
- ~~Electrostatic Spray Application~~
- ~~Electrostatic Bell or Disc Application~~
- ~~Heated Airless Spray Application~~
- ~~Roller Coating~~
- ~~Brush or Wipe Application~~
- ~~Dip and Drain Application~~

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

~~D.3.5 Particulate Matter (PM) [326 IAC 6-3-2]~~

~~Pursuant to CP 117-4210-00014, issued March 28, 1995, and pursuant to 326 IAC 6-3-2, the PM from the surface coating operations shall be limited by the following equation:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$~~E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}~~$$

~~D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.~~

Compliance Determination Requirements

~~D.3.7 VOC Emissions~~

~~Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the previous twelve month consecutive period.~~

~~D.3.8 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~D.3.9 Particulate Matter (PM)~~

~~Pursuant to CP 117-4210-00014, issued March 28, 1995, and in order to comply with Conditions D.3.1 and D.3.5, the dry filters for PM control shall be in proper placement and control emissions from the surface coating facilities at all times when the paint booths are in operation.~~

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.3.10 Operator Training Program~~

~~The permittee shall implement an operator training program.~~

- ~~(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.~~
- ~~(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.~~
- ~~(c) All operators shall be given refresher training annually.~~

~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

~~D.3.11 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.~~
- ~~(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - ~~(2) The volume weighted VOC content of the coatings used for each month;~~
 - ~~(3) The cleanup solvent usage for each month;~~
 - ~~(4) The total VOC usage for each month; and~~
 - ~~(5) The weight of VOCs emitted for each compliance period.~~
- ~~(b) To document compliance with Condition D.3.10, the Permittee shall copies of the training program, the list of trained operators, additional inspections prescribed by the Preventive Maintenance Plan, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.~~
- ~~(c) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.3.3.~~
- ~~(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.~~
 - ~~(2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.~~
 - ~~(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.~~
 - ~~(4) The VHAP content in weight percent of each thinner used.~~
 - ~~(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.~~
- ~~(d) To document compliance with Condition D.3.3(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.~~
- ~~(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

~~D.3.12 Reporting Requirements~~

- ~~(a) — A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~
- ~~(b) — A semi-annual Continuous Compliance Report to document compliance with Condition D.3.3 and the Certification form, shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, within thirty (30) days after the end of the six (6) months being reported.~~

~~The six (6) month periods shall cover the following months:~~

- ~~(1) — January 1 through June 30.~~
- ~~(2) — July 1 through December 31.~~

- ~~(c) — The report required by (b) of this condition shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

~~United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch – Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Deskline 2:

~~(uu) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.~~

Deskline 3:

~~(vv) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F27.~~

~~(ww) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F29.~~

~~(xx) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F28.~~

~~(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)~~

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

~~Pursuant to 117-5122-00014, issued on August 27, 1996, facilities F27, F28, F29, and F30 shall use less than 2.86 tons of VOC per month, including coatings, dilution solvents, and cleaning solvents. This usage limit is required to limit the potential to emit of VOC, from these booths, to less than 34.3 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.~~

D.4.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

~~The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.~~

D.4.3 Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

~~(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:~~

~~(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:~~

~~(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or~~

~~(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or~~

- ~~(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or~~
- ~~(D) Use a combination of (A), (B), and (C).~~
- ~~(2) Limit VHAP emissions from contact adhesives as follows:~~
 - ~~(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.~~
 - ~~(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.~~
 - ~~(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.~~
- ~~(3) The strippable spray booth material shall have a maximum VOC content of eight tenths (0.8) pounds VOC per pound solids.~~
- ~~(b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.~~
 - ~~(1) Operator training courses.~~
 - ~~(2) Leak inspection and maintenance plan.~~
 - ~~(3) Cleaning and washoff solvent accounting system.~~
 - ~~(4) Chemical composition of cleaning and washoff solvents.~~
 - ~~(5) Spray booth cleaning.~~
 - ~~(6) Storage requirements.~~
 - ~~(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).~~
 - ~~(8) Line cleaning.~~
 - ~~(9) Gun cleaning.~~
 - ~~(10) Washoff operations.~~
 - ~~(11) Formulation assessment plan for finishing operations.~~
- ~~(c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.~~

~~D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]~~

~~Pursuant to 117-5122-00014, issued on August 27, 1996, and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:~~

- ~~Airless Spray Application~~
- ~~Air Assisted Airless Spray Application~~
- ~~Electrostatic Spray Application~~
- ~~Electrostatic Bell or Disc Application~~
- ~~Heated Airless Spray Application~~
- ~~Roller Coating~~
- ~~Brush or Wipe Application~~
- ~~Dip and Drain Application~~

~~High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.~~

~~D.4.5 Particulate Matter (PM) [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2, the PM from the surface coating operations shall be limited by the following equation:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$~~E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}~~$$

~~D.4.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.~~

Compliance Determination Requirements

~~D.4.7 VOC Emissions~~

~~Compliance with Condition D.4.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the previous twelve month consecutive period.~~

~~D.4.8 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~D.4.9 Particulate Matter (PM)~~

~~In order to comply with D.4.5, the dry filters for PM control shall be in proper placement and control emissions from the paint booths at all times when the paint booths are in operation.~~

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.4.10 Operator Training Program~~

~~The permittee shall implement an operator training program.~~

- ~~(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.~~
- ~~(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.~~
- ~~(c) All operators shall be given refresher training annually.~~

~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

~~D.4.11 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.
 - ~~(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - ~~(2) The volume weighted VOC content of the coatings used for each month;~~
 - ~~(3) The cleanup solvent usage for each month;~~
 - ~~(4) The total VOC usage for each month; and~~
 - ~~(5) The weight of VOCs emitted for each compliance period.~~~~
- ~~(b) To document compliance with Condition D.4.10, the Permittee shall maintain copies of the training program, the list of trained operators, additional inspections prescribed by the Preventive Maintenance Plan, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.~~
- ~~(c) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.4.3.
 - ~~(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.~~~~

- (2) ~~The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.~~
- (3) ~~The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.~~
- (4) ~~The VHAP content in weight percent of each thinner used.~~
- (5) ~~When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.~~
- (d) ~~To document compliance with Condition D.4.3(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.~~
- (e) ~~All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

D.4.12 Reporting Requirements

- (a) ~~A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~
- (b) ~~A semi-annual Continuous Compliance Report to document compliance with Conditions D.4.3 and the Certification form, shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, within thirty (30) days after the end of the six (6) months being reported.~~

~~The six (6) month periods shall cover the following months:~~

- (1) ~~January 1 through June 30.~~
- (2) ~~July 1 through December 31.~~
- (c) ~~The report required by (b) of this condition shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-601~~

~~and~~

~~United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch – Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

SECTION D.5 — FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

UV Line:

- (yy) — One (1) Robotic Spray Booth, identified as U1, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by water pans, exhausting to stack U1.
- (zz) — One (1) Topcoat Booth, identified as U1A/U1B/U1C/U2, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.
- (aaa) — One (1) NGR Booth, identified as U3, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U3.
- (bbb) — One (1) Sealer Booth, identified as U4, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U4.
- (ccc) — One (1) Wipestain Booth, identified as U5, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U5.
- (ddd) — One (1) Washcoat Booth, identified as U6, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U6.

~~(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)~~

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 — PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

Pursuant to 117-9309-00014, issued on March 20, 1998, facilities U1A/U1B/U1C/U2, U4, U5, and U6, shall use less than 3.24 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC, from these booths, to less than 39 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.5.2 — General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.

D.5.3 — Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

- (a) — The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
- (1) — Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
- (A) — Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or
- (B) — Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on

~~one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or~~

~~(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or~~

~~(D) Use a combination of (A), (B), and (C).~~

~~(2) Limit VHAP emissions from contact adhesives as follows:~~

~~(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.~~

~~(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.~~

~~(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.~~

~~(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.~~

~~(b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.~~

~~(1) Operator training courses.~~

~~(2) Leak inspection and maintenance plan.~~

~~(3) Cleaning and washoff solvent accounting system.~~

~~(4) Chemical composition of cleaning and washoff solvents.~~

~~(5) Spray booth cleaning.~~

~~(6) Storage requirements.~~

~~(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).~~

~~(8) Line cleaning.~~

~~(9) Gun cleaning.~~

~~(10) Washoff operations.~~

~~(11) Formulation assessment plan for finishing operations.~~

~~(c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.~~

~~D.5.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]~~

~~Pursuant to 117-9309-00014, issued on March 20, 1998, and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:~~

~~Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip and Drain Application~~

~~High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.~~

~~D.5.5 Particulate Matter (PM) [326 IAC 6-3-2]~~

~~Pursuant to 117-9309-00014, issued on March 20, 1998, and 326 IAC 6-3-2, the PM from the surface coating operations shall be limited by the following equation:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$~~E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}~~$$

~~D.5.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.~~

Compliance Determination Requirements

~~D.5.7 VOC Emissions~~

~~Compliance with Condition D.5.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the previous twelve month consecutive period.~~

~~D.5.8 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.5.1 and D.5.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~D.5.9 Particulate Matter (PM)~~

~~In order to comply with D.5.5, the dry filters for PM control shall be in proper placement and control emissions from the paint booths at all times when the paint booths are in operation.~~

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.5.10 Operator Training Program~~

~~The permittee shall implement an operator training program.~~

- ~~(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.~~
- ~~(b) Training shall include proper filter alignment, filter inspection and maintenance, proper pan-water level, water pan inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on-site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on-site or available within 1 hour for inspection by IDEM.~~
- ~~(c) All operators shall be given refresher training annually.~~

~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

~~D.5.11 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.5.1.
 - ~~(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - ~~(2) The volume-weighted VOC content of the coatings used for each month;~~
 - ~~(3) The cleanup solvent usage for each month;~~
 - ~~(4) The total VOC usage for each month; and~~
 - ~~(5) The weight of VOCs emitted for each compliance period.~~~~
- ~~(b) To document compliance with Condition D.5.10, the Permittee shall maintain copies of the training program, the list of trained operators, additional inspections prescribed by the Preventive Maintenance Plan, and training records shall be maintained on-site or available within 1 hour for inspection by IDEM.~~
- ~~(c) To document compliance with Condition D.5.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.5.3.
 - ~~(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.~~~~

- ~~(2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.~~
- ~~(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.~~
- ~~(4) The VHAP content in weight percent of each thinner used.~~
- ~~(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.~~
- ~~(d) To document compliance with Condition D.5.3(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.~~
- ~~(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

D.5.12 Reporting Requirements

- ~~(a) A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.5.3 and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the six (6) months being reported.~~

~~The six (6) month periods shall cover the following months:~~

- ~~(1) January 1 through June 30.~~
- ~~(2) July 1 through December 31.~~
- ~~(c) The report required by (b) of this condition shall be submitted to:~~

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

~~United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

SECTION D.6 D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Wood Milling and Assembly Operations:

- (eee) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.
- (fff) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.42.1 Best Available Control Technology (BACT) Condition

...

D.6.2 2.2 Particulate Matter (PM) [326 IAC 6-3-2]

...

D.6.3 2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

...

Compliance Determination Requirements

D.6.4 2.4 Particulate Matter (PM)

Pursuant to CP 117-4210-00014, issued on March 28, 1995, and in order to comply with Conditions D.6.2.1 and D.6.2.2, the baghouses for PM control shall be in operation and control emissions from the Wood Milling and Furniture Assembly operations at all times that the facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.52.5 Visible Emissions Notations

...

- (e) **If abnormal emissions are observed at the Wood Milling and Furniture Assembly stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.** ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.

D.6.62.6 Parametric Monitoring

Pursuant to CP 117-4210-00014, issued on March 28, 1995, the Permittee shall record the ~~total static~~ pressure drop across the baghouses used in conjunction with the Wood Milling and Furniture Assembly operations, at least once weekly when the wood milling and furniture

assembly are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.

The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge and Other Instrument Specifications~~, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.6.72.7 Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.~~
- ~~(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~
- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6-82.8 Record Keeping Requirements

- (a) To document compliance with Condition D.62.5, the Permittee shall maintain records of daily visible emission notations of the wood milling and furniture assembly stack exhaust when venting to the atmosphere.
- (b) To document compliance with Condition D.62.6, the Permittee shall maintain the following:
 - (1) Weekly records of the ~~inlet and outlet differential static~~ pressure **drop** during normal operation when venting to the atmosphere; and
 - (2) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.7 D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

Woodworking Operations:

- (a) Woodworking facilities, identified as DC7/8 and DC9/10, constructed in 1996, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by two baghouses, exhausting to stack 7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.43.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

...

Compliance with these limitations will satisfy the requirements of Condition D.73.2 (326 IAC 2-2) and D.73.3 (326 IAC 6-3-2).

D.7.23.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

...

D.7.33.3 Particulate Matter (PM) [326 IAC 6-3-2]

...

D.7.43.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

...

Compliance Determination Requirements

D.7.53.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)(DD)]

Pursuant to CP 117-5122-00014, issued on August 26, 1996, and in order to comply with conditions ~~D.7.1, D.7.2 and D.7.3~~ **D.3.1, D.3.2 and D.3.3**, the baghouse/cyclone combination for PM control shall be in operation and control emissions from the woodworking facilities exhausting to stack 7 at all times that the facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.7.73.6 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.73.1(c) are not required, and will be replaced by the following:

...

- (e) **If abnormal emissions are observed at the woodworking operations, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.** ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a violation of **deviation from this permit.**

D.7.83.7 Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B – Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- ~~(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).~~
- (a) **For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) **For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.93.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.73.1(c) and D.73.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust when exhausting to the atmosphere.

...

SECTION D.8 D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: two (2) 2.07 MMBtu/hr boilers, constructed in 1998. [326 IAC 6-2-4]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.14.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (~~Process Operations~~)(**Particulate Emission Limitations for Manufacturing Processes**), insignificant sources of particulate matter shall not exceed the allowable PM emission rate based on the following equation:

D.8.24.2 Particulate Matter (PM) Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

...

SECTION E.1 PLANTWIDE APPLICABILITY LIMITATION REQUIREMENTS

Facility Description [326 IAC 2-7-5(15)]

The entire plant site is subject to the Plantwide Applicability Limitation [PAL] requirements described in this E section.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Source Wide Emission Limits [326 IAC 2-2.4-7(1)]

E.1.1 Emission limits [326 IAC 2-2.4-7(1)]

Volatile Organic Compounds (VOC) emissions from the entire source shall not exceed 419.5 tons per 12 consecutive month period with compliance determined at the end of each month. This provision does not supersede any other VOC emission limits contained in this permit.

General PAL Requirements [326 IAC 2-2.4-1]

E.1.2 Major New Source Review Applicability [326 IAC 2-2.4-1(c)]

Any physical change in or change in the method of operation of this source is not a major modification for VOC, and not subject to the review requirements of 326 IAC 2-2 provided the actual emissions of VOC from the entire source do not exceed the emission limits in Condition E.1.1 of this permit.

E.1.3 General PAL requirements [326 IAC 2-2.4-7, 326 IAC 2-2.4-8, 326 IAC 2-2.4-9, 326 IAC 2-2.4-10, 326 IAC 2-2.4-11, 326 IAC 2-2.4-15]

- (a) The requirements of this E Section become effective on the issuance date of SPM 117-22546-00014, and expire ten years after that issuance date.
- (b) If the Permittee applies to renew this PAL at least six months prior to expiration of the PAL, but no earlier than eighteen months prior to the expiration of the PAL, then notwithstanding the expiration date in subsection E.1.3(a), the PAL shall continue to be effective until the revised permit with the renewed PAL is issued. The application must contain the elements described in 326 IAC 2-2.4-3 and 326 IAC 2-2.4-10.
- (c) Once this PAL expires, if not otherwise renewed, then the requirements of 326 IAC 2-2.4-9 are applicable.
- (d) The requirements for renewing this PAL are described in 326 IAC 2-2.4-10.
- (e) The requirements for increasing the emissions limits described in Condition E.1.1 are described in 326 IAC 2-2.4-11.
- (f) The requirements applicable to terminating or revoking this PAL are described in 326 IAC 2-2.4-15.

Monitoring Requirements [326 IAC 2-2.4-7(6) & (7)] [326 IAC 2-2.4-12]

E.1.4 Volatile Organic Compound (VOC) Emission Limit Determination [326 IAC 2-2.4-7(6) and (7)] [326 IAC 2-2.4-12]

The Permittee shall determine actual annual emissions of VOC by employing the following techniques:

- (a) The Permittee shall calculate VOC emissions (in tons) from all surface coating activities and related operations, each calendar month using mass balance calculations. The monthly VOC emissions are the sum of the VOC emissions from each coating or solvent used during the month. The VOC emissions from each coating or solvent will be calculated by multiplying the VOC content of a coating or solvent by the amount of that coating or solvent used during the calendar month.
- (b) The mass balance calculations described in (a) above shall meet the following requirements:
 - (1) The Permittee shall provide a demonstrated means of validating the published content of the VOC that is contained in or created by all materials used in or at the emissions units.
 - (2) Assume that each emission unit emits all of the VOC that is contained in or created by that unit if it cannot otherwise be accounted for in the process.

- (3) Where the vendor of a material, which is used in or at an emissions unit, publishes a range of pollutant content from the material, the Permittee must use the highest value of the range to calculate VOC emissions unless the IDEM determines there is site-specific data or a site-specific monitoring program to support another content within the range.**
- (c) The VOC emissions from the insignificant boilers and heaters shall be calculated using the appropriate AP-42 emission factors and the total heat input capacity or fuel usage of the units.**

Record Keeping and Reporting [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

E.1.5 Record keeping requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-13]

- (a) The Permittee shall retain a copy of all records necessary to determine compliance with the requirements of this E Section and Condition D.1.1(a), including a determination of each emissions unit's twelve (12) month rolling total emissions, for five years from the date of the record. Those records include, but are not limited to:**
 - (1) The amount and VOC content of each coating material and solvent used at the source. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
 - (2) The volume weighted VOC content of the coatings used for each month;**
 - (3) The cleanup solvent usage for each month;**
 - (4) The total VOC usage for each month; and**
 - (5) The weight of VOCs emitted for each compliance period.**
- (b) The Permittee shall retain a copy of the PAL permit application, any applications for revisions to the PAL, each annual compliance certification as required by Condition B.9 of this permit, and data relied on in the certification for the duration of the PAL plus five years.**

E.1.6 Reporting requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-14]

- (a) The Permittee shall submit a semi-annual report, containing the information described below, to the address listed in Section C – General Reporting Requirements, within thirty (30) days after the end of the calendar quarter being reported. This report requires the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). The report shall include the following information:**
 - (1) The identification of the owner and operator of the source and the permit number.**
 - (2) Total emissions of VOC, in tons per rolling 12 month period for each month in the reporting period, as determined by Condition E.1.4.**
 - (3) All data relied upon, including but not limited to, any quality assurance or quality control data, in determining emissions.**
 - (4) A list of any emissions units modified or added to the major stationary source during the reporting period.**

- (5) If not previously reported pursuant to another condition in this permit, the number, duration, and cause of any deviations or monitoring malfunctions, and any corrective action taken.
- (b) The procedures for reporting deviations from the requirements of this Section E, and the procedures for reporting emissions in excess of the limit in Condition E.1.1 are described in Condition B.15. A report that describes emissions exceeding the PAL limit shall include the quantity of emissions emitted by the source. This term satisfies the requirements of 326 IAC 2-2.4-14(c).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

Part 70 QUARTERLY REPORT

Source Name: _____ Paoli, Inc.
 Source Address: _____ 201 E. Martin Street, Orleans, IN 47452
 Mailing Address: _____ P.O. Box 30, Paoli, IN 47454
 Part 70 Permit No.: _____ T117-6003-00014
 Facility: _____ Spray booths F2A, F6A, F6B, and F13
 Parameter: _____ Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
 Limit: _____ Less than 20 tons per month (less than 240 tons per 12 consecutive month period)

_____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

_____ No deviation occurred in this quarter.

_____ Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 QUARTERLY REPORT

Source Name: _____ Paoli, Inc.
Source Address: _____ 201 E. Martin Street, Orleans, IN 47452
Mailing Address: _____ P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: _____ T117-6003-00014
Facility: _____ Spray booths F1 through F12, and F14 through F16
Parameter: _____ Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit: _____ Less than 20 tons per month (less than 240 tons per 12 consecutive month period)

_____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

_____ No deviation occurred in this quarter.

_____ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 QUARTERLY REPORT

Source Name: _____ Paoli, Inc.
Source Address: _____ 201 E. Martin Street, Orleans, IN 47452
Mailing Address: _____ P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.: _____ T117-6003-00014

Facility: ~~_____~~ Spray booths F27, F28, F29, and F30
 Parameter: ~~_____~~ Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
 Limit: ~~_____~~ Less than 2.86 tons per month (less than 34.3 tons per 12 consecutive month period)

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

_____ No deviation occurred in this quarter.

_____ Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 Semi-Annual Report
 Part 70 SEMIANNUAL REPORT**

Source Name: Paoli, Inc.
 Source Address: 201 E. Martin Street, Orleans, IN 47452
 Mailing Address: P.O. Box 30, Paoli, IN 47454
 Part 70 Permit No.: T117-6003-00014
 Facility: All spray booths of the UV line; U1A, U1B, U1C, U1, U2, U3, U4, U5, and U6
Entire Source
 Parameter: Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents **Total plantwide VOC emissions**
 Limit: Less than 3.24 tons per month (less than 39 tons per 12 consecutive month period) **419 tons per 12 consecutive month period with compliance determined at the end of each month**

YEAR: _____

Month	Column 1 Plantwide VOC Emissions	Column 2 Plantwide VOC Emissions	Column 1 + Column 2 Plantwide VOC Emissions
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
Month 4			
Month 5			
Month 6			

Along with this report, the Permittee shall submit the information required by Condition E.1.6 in a manner consistent with that condition and Section C of the Part 70 permit.

No deviation occurred in this quarter.
 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance Data Section**

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Paoli, Inc.
 Source Address: 201 E. Martin Street, Orleans, IN 47452
 Mailing Address: P.O. Box 30, Paoli, IN 47454
 Part 70 Permit No.: T117-6003-00014

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. ~~Deviations that are required to be reported by an applicable requirement~~

~~shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~ Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

...

Upon further review, IDEM, OAQ has decided to make the following changes to the permit:

1. Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirements to keep records of the inspections have also been removed from the permit. Therefore, Conditions D.1.9 and D.1.10 have been changed as follows:

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.409 Operator Training Program

...

~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.1.410 Record Keeping Requirements

...

- (b) To document compliance with Condition D.1.9, the Permittee shall maintain copies of the training program, the list of trained operators, ~~additional inspections prescribed by the Preventive Maintenance Plan,~~ and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
2. Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirements to keep records of the inspections have also been removed from the permit as shown below:

~~D.7.6 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)]~~

~~An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.~~

~~D.7.93.8 Record Keeping Requirements~~

...

- (b) ~~To document compliance with Condition D.7.6, the Permittee shall maintain records of the results of the inspections required under Condition D.7.6 and the dates the vents are redirected.~~

- ~~(e)~~ **(b)** The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd).
- ~~(d)~~ **(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Conclusion and Recommendation

The operation of this source shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No 117-22546-00014. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.

Appendix A

Baseline Actual Emissions and PAL Limit

Paoli, Inc. is a stationary source that manufactures and coats wood office furniture. The source currently operates nine (9) coating lines; six used to coat desks, one used to coat chairs, one used to coat drawers and one UV line. None of the booths that comprise the coating lines use add-on VOC controls. Compliance with VOC usage limits is met through extensive recordkeeping of the amounts and types of coatings used.

The primary source of VOC emissions is the direct and indirect use of numerous wood coatings. Additional sources of VOC emissions include ancillary operations (coating storage and mixing, solvent use), two (2) 2.07 MMBtu/hr boilers, two (2) dip tanks and one (1) research and development booth.

Emissions units

Section A.1 of the permit lists the emissions units as they are currently organized in the existing Title V permit for Paoli, Inc. Only the emission units at the site with the potential to emit VOC are involved in this PAL permit.

The following table lists the emission units covered by the VOC PAL:

Table 1: Source Emissions Units

Emission Unit ID	Description	Applicable requirements
Desk Line 1: booths F2A, F6A, F6B, F13, F1, F12, F2, F3, F4, F5 and F6	Surface coating	See Section D.1 and E.1 of the permit
Desk Line 2: booths F15, F16, F17, F19, F23, F22, F45, F46, F47, F28 and F30	Surface coating	
Desk Line 3: booths F27 and F29	Surface coating	
Deskline 4: booths F25 and F24	Surface coating	
Desk Line 5: booths F14, F11 and F8	Surface coating	
Desk Line 6: booths F20, F21, C12, F26 and F44	Surface coating	
Desk Line 1 & 2: booth F10	Surface coating	
Drawer Line: booths F9 and F7	Surface coating	
Chair Line: booths C1 through C11	Surface coating	
UV Line: booths U1, U1A/U1B/U1C/U2, U3, U4, U5 and U6	Surface coating	
Insignificant activity: R&D booth and dip tanks	Surface coating	
Insignificant activities: heaters and boilers	Indirect heating	

Baseline Actual Emissions/Proposed PAL limit

Under the PAL rules in 326 IAC 2-2.4-6, the PAL emission limit is equal to the sum of the baseline actual emissions rate for each PAL pollutant and an amount equal to the significant emission rate for the pollutant.

Baseline actual emissions are defined in 326 IAC 2-2-1(xx) as the average actual emissions from any 24 month period of the last 10 years. It includes downward adjustments for noncompliant emissions that may have occurred during the baseline period and for new applicable requirements that apply to emission units since the time of the baseline period.

The baseline actual emissions are expressed by the following equation:

**Baseline actual emissions = Average actual emissions from any 24 month period of last 10 years
 [includes fugitive emissions, and SSM event emissions]**

- any noncompliant emissions that occurred during the 24 month period
- adjustment for applicability of new requirements since baseline period

Baseline period

Paoli, Inc. has proposed a baseline period of the 24 month period beginning January 1, 1996 and ending December 31, 1997.

Baseline actual emissions and adjustments

As described above, the starting point for the baseline actual emissions are the actual emissions of the PAL pollutants (VOC in this case) during the proposed baseline period. These emission levels are then adjusted downward to reflect any non-compliant emissions or the applicability of new emission limits or other requirements for the facilities. Paoli, Inc. has not had any noncompliant emissions or new requirements imposed during the baseline period. Therefore, no downward adjustments to baseline actual emissions are necessary.

The following table presents the baseline actual emissions of all VOC-emitting units at the source during the baseline period:

Emission Unit	Unit Designation under PAL rule	PTE (tpy VOC)	Average Actual Emissions (tpy VOC)
Desk Line 1	Major	959.3 *	305.2
Desk Line 2 **	Major		
Desk Line 3 **	Small		
Desk Line 4	Major		
Desk Line 5	Major		
Desk Line 6	Major		
Drawer Line	Major		
Chair Line	Major		
Heaters, boiler, R&D booth and dip tanks	Small	1.0	1.0
TOTAL Actual Emissions			306.2
Noncompliant Adjustment			0.0
New requirements Adjustment			0.0
Baseline Actual Emissions			306.2

* Pursuant to T 117-6003-00014, issued March 28, 2002, the units that comprise these lines were subject to four separate VOC emission limits totaling 959.3 tpy VOC. These limits covered various booths across multiple surface coating lines. As a result, the OAQ is unable to accurately determine the limited PTE of each line. Therefore, the sum of those limits is presented in this table as the aggregate PTE for the respective lines.

** Does not include the emissions from booths F45 – F47 and booths F27 – F30 because these booths were constructed after the baseline period.

Paoli, Inc. provided the following actual emissions data for the surface coating operations:

January 1, 1996 – December 31, 1996: 309.59 tons VOC
January 1, 1997 – December 31, 1997: 300.89 tons VOC

The average actual VOC emissions for the surface coating operations over the baseline period are 305 tons per year. The annual emissions figures supplied by Paoli, Inc. are equal to the total VOC of all coatings used at the source during the baseline period. Total coating use was determined by a detailed review of purchase records from the coating supplier and inventory records from Paoli, Inc. It is assumed that 100% of the VOC in the coatings used during the baseline period was emitted.

PAL emission level

The establishment of the PAL emission level, as described above, also includes adjustments from the general rule to address emission units that have been shutdown or added since the baseline period. For a PAL, the emission limit can be described with the following equation:

PAL emission level = Baseline actual emissions [as adjusted]

- emissions from emission units that have been shut down since baseline period

+ potential to emit of emissions units that have started up since baseline period

+ significant emission increase [40 tpy for VOC]

None of the units included in the baseline period (1/1/96 – 12/31/97) have been shut down since that time. However, Paoli, Inc. has added several booths since the baseline period:

In 1998, Paoli, Inc. added booths F45, F46 and F47 and the UV Line. Pursuant to 117-9309-00017, issued March 20, 1998, the VOC emissions from the UV line are limited to less than 39 tons per twelve consecutive month period. Consequently, the VOC PTE of the UV Line is 39 tons per year. Determination of the VOC PTE of booths F45, F46 and F47 is not as simple as these booths are covered by a 445 ton per year VOC limit imposed pursuant to 326 IAC 2-2-3. Since the VOC PTE of booths F45, F46 and F47 is not sufficiently quantifiable, the emissions from these booths are not used towards the development of the PAL.

In 1999, Paoli, Inc. added booths F27, F28, F29 and F30. Pursuant to 117-5122-00014, issued August 27, 1996, the VOC emissions from booths F27, F28, F29 and F30 are limited to 34.3 tons per twelve consecutive month period. Consequently, the VOC PTE of booths F27, F28, F29 and F30 is 34.3 tons per year.

As a result, the following table presents the PAL emission level provided by this significant permit modification:

Baseline Actual Emissions (tpy VOC)	306.2
Actual Emissions of units shut down since baseline period (tpy VOC)	0.0
PTE of units that have started up since baseline period (tpy VOC)	39.0 + 34.3
NSR significance level (tpy VOC)	40.0
PAL emission level (tpy VOC)	419.5